

The Governing Body of Denstone College understands its regulatory responsibilities and will maintain an effective oversight of this policy, by evaluating its effectiveness, and reviewing and implementing change.

Safeguarding Children Policy

This Policy is applicable to all pupils, including those in the EYFS.

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Aims and Principles

Denstone College fully recognises its legal duty under section 157 Education Act 2002 and the 1989 Children Act and takes seriously its responsibilities to protect and safeguard the interests and welfare of all children. The school recognises that effective safeguarding requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to child protection situations. Safeguarding and promoting the welfare of children is all staff's responsibility. The school has a culture of safety, equality and protection, listening to children and that enables issues about safeguarding and welfare to be addressed.

We all have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of *it could happen here* where safeguarding is concerned.

This policy provides the basis for good practice within the school for Child Protection work. It should be read in conjunction with and Staffordshire Safeguarding Children Board (SSCB) Inter-Agency Child Protection Policies and Procedures, *Keeping Children Safe in Education 2021*, *Working Together to Safeguard Children 2018 (amended 2020)*, *What to do if you are worried a child is being abused March 2015*, *Prevent Duty Guidance: for England and Wales (July 2015, updated 2021)*, *The use of social media for on-line radicalisation (July 2015)*, *Information sharing (2018)* and the *Data Protection Act 2018*. These are in keeping with relevant national procedures and reflect what Staffordshire Safeguarding Children's Board considers to be safe and professional practice in this context. Child Protection has to be considered within the context of Every Child Matters, taking account of the need for children "being healthy and staying safe" and within professionals' wider safeguarding responsibilities that include a duty to co-operate, under the Children Act 2004.

The aim is to follow the procedures set out by Staffordshire Safeguarding Children's Board, *Working Together to Safeguard Children 2018 (amended 2020)*, and *Keeping Children Safe in Education 2021* by:

- Knowing that safeguarding and promoting the welfare of children is everyone's responsibility, and the voice of the child is evident, the child's wishes and feelings are taken into account when determining what action to take
- Protecting children and young people at our school from maltreatment
- Establishing a safe environment in which our children can learn and develop within an ethos of openness
- Preventing impairment of our children and young people's mental and physical health or development
- Ensuring young people at our school grow up in circumstances consistent with the provisions of safe and effective care.
- Offering children, a balanced curriculum including PHSE, healthy relationship education, online safety, sexting
- Offering children and young people balanced curriculum through online activities, enabling them to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Understanding that no single professional can have the full picture of a child's needs and circumstances. Everyone who comes into contact with children and their family has a role to play in identifying concerns, sharing information and taking prompt action.

- Undertaking the role so as to enable children and young people at Denstone have the best outcomes, knowing that their concerns will be treated seriously and knowing they can safely express their views and give feedback.
- Ensuring as a school we have a clear understanding of our staff's knowledge and understanding and embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our school

Staffordshire Safeguarding Children Board (SSCB) is the key decision-making forum and will consist of:

- Staffordshire Police represented by an Assistant Chief Constable
- Staffordshire Clinical Commissioning Groups represented by the Executive Director of Nursing and Quality
- Staffordshire County Council represented by the Director for Families and Communities

Invitations will be extended to Partners to present reports and to other guests, as and when required, to present information which is relevant to the Annual Business Plan and priorities and in keeping with children safe in Staffordshire. The chairing of the meeting will rotate every six months between the statutory Safeguarding Partners (Police, Clinical Commissioning Group and the Local Authority) . The board will meet on a quarterly basis with support provided by the Children's Safeguarding Board Team (or as required should the need arise) The three safeguarding partners should make arrangements to allow the school to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name the school as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

These procedures aim to provide a framework which ensures that all practice in the area of child protection is consistent with stated values and procedures that underpin all work with children and young people. Education staff have a crucial role to play in helping identify welfare concerns, and indicators of possible abuse or neglect at an early stage.

In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

They should refer those concerns to the appropriate organisation, normally the Local Authority children's social care, contributing to the assessment of a child's needs and where appropriate to ongoing action to meet those needs. *Working Together to Safeguard Children 2018(amended 2020)*.

The school aims to ensure that staff have the skills, knowledge and understanding necessary to keep children safe, including those who are looked after by a local authority. This includes ensuring that staff are in a position to identify concerns early, provide help for children, and prevent concerns from escalating as well as having the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers.

Underpinning Values

Where there is a safeguarding issue, the school will work in accordance with the principles outlined in the Staffordshire Safeguarding Children Board (SSCB) Inter-agency Child Protection procedures:

- A child's welfare is paramount. Each child has a right to be protected from harm and exploitation and to have their welfare safeguarded. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.
- Each child is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs.
- Children, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances.
- Each child has a right to be consulted about actions taken by others on his/her behalf. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings. However, it may not always be possible to respect a child/carer's request for confidentiality. If a child may be at risk of significant harm, there is a duty on the school to share information with children's social care. This should be explained to the child and appropriate reassurance given when the child has expressly asked for confidentiality in these circumstances. Parental consent is not required for a referral to statutory agencies where there is a concern regarding a child's safety.
- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare. The welfare of the child is paramount in such situations.
- Open-mindedness and honesty must guide each stage of assessment and of operational practice. The strengths of individual family members, as well as their needs, should be given due consideration.
- Personal information is confidential. It should only be shared with the permission of the individual concerned, or unless the disclosure of confidential personal information is necessary in order to protect a child. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict need to know basis.
- Professionals should be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do.
- Explanations by professionals to children, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms.
- Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation.
- Early intervention in providing support services utilising the Common Assessment Framework Process and if necessary, an assessment under Section 17 of the Children Act (1989) this is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children.

Commitment

The school is committed to the importance of safeguarding and promoting children's welfare. The Head takes responsibility for monitoring the actions of Denstone staff to safeguard and promote the welfare of children, ensuring that all pupils are listened to appropriately and that appropriate action is taken regarding any concerns expressed about their welfare. The school recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the Safeguarding Team, sharing information

with other professionals to support early identification and assessment. It is recognised that pupils require high self-esteem, confidence, supportive friends and clear lines of communication with trusted adults.

Denstone College will therefore:

- Maintain an ethos where pupils feel secure, are encouraged to talk and are heard and are educated about safeguarding.
- Ensure that pupils are aware they can approach any member of staff if they have concerns or are in difficulties and that staff will listen.
- Ensure that pupils are aware of who the Safeguarding Team are, as well as other key staff who are there to listen and offer early help, including their teachers, Head of Prep, Head of Pre-Prep medical centre, school counsellor, tutors, Heads of House, Heads of School/Moss Moor, Senior Pastoral lead, Senior Master, Deputy Head (Pastoral), Chaplain, Second Master, or any member of School staff. In particular the medical centre is available for pupils to drop in to discuss issues, the school counsellor also has regular drop in sessions.
- Include in the PSHE programme the knowledge and skills pupils require to stay safe, including education on online safety including the dangers of cyber-bullying and sexting, Relationship and Sex Education and Health Education. A variety of approaches will be employed. Within that programme the encouragement for pupils to develop realistic attitudes regarding the responsibilities of adult life. To help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. Children should understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable children and adults.
- Ensure Internet safety will be integral to the School's ICT curriculum
- Ensure effective IT systems to safeguard pupils from potentially harmful and inappropriate online material. (See Digital Safety Policy)
- Create an environment where staff feel able to raise a concern and feel supported in their safeguarding role.
- Ensure that every effort will be made to establish effective, communicative relationships between staff, parents and other agencies.

Overarching Framework

All members of staff, whether permanent, temporary or volunteers, who have contact with children and/or their families, will have a clear understanding of the School's responsibilities for safeguarding children and promoting their welfare. All staff, including temporary staff and volunteers who work with children will be made aware of the child protection arrangements.

Designated Safeguarding Leads (DSL) will ensure that there is appropriate training of all staff so that they know how to seek advice and report any concerns- especially when they are concerned that a child may be suffering or be at risk of suffering harm – and that all staff have access to support and appropriate expert advice in this context. Individual responsibilities for safeguarding and promoting the welfare of children will be encompassed within relevant job descriptions and procedures.

Denstone College safeguarding policies and procedures will as far as possible, take account of the views of children and families, provide children and young people with a safe environment in which to learn and develop. The school will provide a range of preventive and statutory measures to safeguard and promote the welfare of children and young people.

Staff who work or have contact with children and families will have appropriate training consistent with their role and function. This training will include the necessity for effective multi-agency and inter-professional collaboration.

Information is to be shared efficiently and effectively in respect of issues that may affect the safety and welfare of children. This includes ensuring that concerns are shared early in order to prevent serious problems from developing. Clear procedures will ensure that information is shared effectively, appropriately and as the law prescribes. Denstone College will also fulfil its requirements to report concerns about any person (whether employed, contracted, a volunteer or student) in a position of trust, to the Disclosure and Barring Service (DBS) within one month of leaving Denstone School.

Recruitment and vetting procedures are in place to prevent unsuitable people from having contact with children. This includes seeking the assurance that appropriate child protection checks and procedures apply to any staff employed or engaged by another organisation who are working with the school's pupils on another site on behalf of Denstone School. The recruitment panel will have at least one member of staff who has completed the safer recruitment training

Safe practice is promoted and poor and unsafe practice is challenged appropriately. Allegations or concerns about permanent or temporary staff or volunteers are handled effectively and in accordance with the Employment Manual.

Within the EYFS setting, the use of personal mobile phones and other potential video recording equipment is not permitted by parents, visitors or staff whilst on the EYFS premises. All staff including staff in the EYFS department are aware and follow the policy and procedures relating to the use of mobile phones, cameras and use of social media and as outlined in the Mobile Phone Policy, Use of Social Media Policy and Staff Handbook.

Safeguarding is the responsibility of every adult in the school environment; staff must not work in isolation. The development of appropriate procedures and the monitoring of good practice are the responsibility of the Staffordshire Safeguarding Children Board (SSCB) and the school's procedures are based on those of the SSCB.

Safeguarding Team-Roles and Responsibilities

The designated personnel for safeguarding and children's welfare issues are

Main DSL is Karenann Hood (Deputy Head Pastoral, member of SMT)

DSL for the College is Sister Angela Smith (Senior Nurse)

DSL for the Prep is Tracey Davies (Head of the Prep., member of SMT)

Deputy DSLs in the College are Jackie Plewes (Senior Pastoral Lead), Sister Michelle Edge (Medical Nurse), Sister Lear (Medical Nurse), Gareth Jones (Senior Master, member of SMT) Richard Neal (Assistant Head of Senior School)

Deputy DDSL for The Prep is Claire Clews (Head of Pre-Prep and Safeguarding Lead of EYFS).

Karenann Hood is the designated teacher to promote the educational achievement of looked after children (LAC) in the College and Tracey Davies in the Prep School, as well as having the 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 and should liaise with the local authority personal advisor for the care leaver when they leave the school.

Karenann Hood is the main DSL and so takes responsibility for the safeguarding policy and is the lead responsible for safeguarding and child protection and the senior mental health lead at Denstone School.

Richard Neal is responsible for organising Level one Safeguarding training for all members of Denstone College staff.

The DSLs will ensure that there is always cover for the role (including any out of hours/out of term activities). This policy is reviewed annually, or sooner if circumstances arise which require immediate amendments to the policy. The Safeguarding Team liaise with the SSCB and work with other agencies in line with *Working Together to Safeguard Children 2018 (amended 2020)*. The DSL and deputies are most likely to have a complete safeguarding picture. Any disclosure or suspicion of abuse will be referred to social services (either via **Staffordshire Childrens Advice and Support** or to a child's existing social worker) by telephone within 24 hours by one of the DSLs or Deputy DSLs. It will then be confirmed in writing within 24 hours. Regarding EYFS registered providers must inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere. These notifications must be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made.

The DSL and any deputies should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children 2018 (amended 2020)*. National Police Chiefs Council (NPCC)- When to call the police NPCC Guidance 'When to call the Police'. will help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Jane Dickson is the named Governor for Safeguarding Children and looked after children. The Governing body take leadership responsibility for safeguarding arrangements at Denstone School

- To ensure the school has appropriate policies and procedures in place in order for appropriate action to take place in a timely manner to safeguard and promote children's welfare.
- To liaise with SSCB on issues of Child Protection and to ensure that school's safeguarding arrangements reflect local protocols for assessment, to recognise the importance of information sharing between professionals and local agencies.
- To ensure that all staff members undergo safeguarding and child protection training at induction, that their training is regularly updated in line with advice from the SSCB, and that they receive child protection updates, including online safety at least annually.
- To ensure that children are taught about safeguarding, including online, through teaching and learning opportunities.
- To create an environment where staff feel supported in their safeguarding role and are able to raise concerns.
- To ensure staff have regular reviews of their own practice so that they have knowledge, skill and experience to improve.

Jane Dickson has received Level One Child Protection Training. Governors are not given details of specific situations, to avoid breach of confidentiality. The governing body undertakes an annual review, each February of the school's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged, which is signed off by the Chair of the Governors. The governing body also ensure that Denstone College has effective E-safety policies and procedures.

Safeguarding Team-Managing referrals:

It is the role of the DSLs to ensure the SSCB procedures are followed within the school (full local procedures are available on the SSCB website; see [Appendix 1](#)), to make relevant referrals to the agency according to guidance given, and to refer all cases of suspected abuse to the local authority children's social care, other external safeguarding agencies and Ofsted (for EYFS). Normal referral processes are also available when there are concerns about children who may be at risk of being drawn into terrorism. The Head, or in her absence the Chair of the Governors, will refer all suspected cases which concern a member of staff to the local authority designated officer (LADO) for child protection concerns. The HR manager will notify the Disclosure and Barring Service (in cases where a person is dismissed or has left due to risk/harm to a child) and is responsible for informing Ofsted and the DfE of any information that is required to go on its register. The DSLs will refer all cases of suspected abuse to the Police (cases where a crime may have been committed) and will liaise with the Head to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. The DSLs will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. The school must communicate readily with a local safeguarding agency whenever an allegation or disclosure of abuse has been made (*Working Together to Safeguard Children 2018 (amended 2020)*, and *Keeping Children Safe in Education 2021*). The DSLs are designated to take the responsibility for liaising with the local authority Children's Services department, and to co-ordinate action with Children Services and, where applicable, the police following any child protection allegation or suspicion affecting a pupil. The safeguarding team holds a copy of *Working Together to Safeguard Children 2018 (amended 2020)*, as well as access to all SSCB procedures via their website.

Safeguarding Team-Training

The DSL and Deputy DSL will receive appropriate training carried out at least every two years in child protection training, from inter-agency working protocols and training in SSCB's approach to Prevent duties. Karenann Hood and Sister Smith have undertaken the Prevent Awareness Training run by SSCB and Local Police.

In addition to the formal training set out above, the knowledge and skills of the Safeguarding Team will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow the team to understand and keep up with any developments relevant to their roles.

The Safeguarding team will:

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the School's Safeguarding policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Safeguarding Team-Raising Awareness

It is also a requirement to ensure all employed staff within the school are aware of its internal procedures, and to advise and support staff, where required. The safeguarding team will assist staff to understand and discharge their roles and responsibilities as set out in part 1 of *Keeping Children Safe in Education 2021*, which will include verbal briefings summarising the provisions of Part 1 and Annex B.

The DSLs should ensure the school's policies are known and used appropriately: Ensure the school's Safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this. Ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this. The Safeguarding team has links with the SSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding. When children leave the school ensure their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file.

Training and support of Staff and Senior Pupils.

Denstone College will ensure the DSLs and the Deputy DSLs and the nominated Governor receive training and updates relevant to their roles.

All school staff will undertake awareness training provided by SSCB, during induction and periodically (3 year intervals) to refresh and update knowledge and understanding, this includes on-line safety and prevent. In addition, all staff receive safeguarding and child protection updates, including online safety as required, but at least annually (via either staff meetings, email or INSET) to provide them with the relevant skills and knowledge to safeguard children effectively. Any reason for staff to be having personal and/or social contact with pupils at the school must be explained to the Head with the rationale and any safeguarding actions required will be recorded. Richard Neal is responsible for organising this training for staff. Alongside this the Safeguarding team will cascade information to staff as they attend training to further enhance the awareness of staff. All Staff are trained to know what to do if a child makes a safeguarding disclosure. All staff will reassure the victim that they are being taken seriously and that they will be supported and kept safe.

All staff are trained to manage a report of child on child sexual violence and sexual harassment. All staff including visiting peripatetic teachers, temporary, voluntary staff will have an induction into the child protection procedures when they join the school. They should be aware of the SSCB procedures as part of that induction programme, and these are explained to them as part of the staff induction. Staff will be provided with induction training that explains Denstone School's Safeguarding Policy (including identify and roles of the DSL and Deputy DSL), the Staff Code of Conduct, the Behaviour Policy, the Missing Pupils policy, the Digital Safety Policy (online safety) and a copy of Part 1 of *Keeping Children Safe in Education 2021 and Annex B*. They will also attend the Level 1 Safeguarding and Promoting the Welfare of Children and Young People training within 6 months of joining the school and complete online prevent training

(<http://www.elearning.prevent.homeoffice.gov.uk><<http://www.elearning.prevent.homeoffice.gov.uk>). Each time Part 1 of *Keeping Children Safe in Education 2021* and Annex B is updated staff will be issued with a copy and required to read the document, INSET will be provided to ensure staff understand the document. All staff are also trained to manage a report of child on child sexual violence and sexual harassment. Contractors working regularly at school will also receive basic safeguarding training at a level appropriate to their role as a minimum it will include knowledge of the identity of the Safeguarding team, and the duty to pass on concerns and to adhere to appropriate behavioural boundaries.

Senior Pupils given positions of responsibility over other pupils are briefed on appropriate actions to take should they receive allegations of abuse.

Support will be available for staff from the DSLs, the Deputy DSLs and also the Senior Management team, with regard to concerns about safeguarding children.

The Safeguarding team will also offer peer support to each other. Opportunities are provided to staff to contribute and shape safeguarding arrangements and policy through discussion with the Safeguarding team and staff INSET.

This policy will be published to parents and guardians on the School website in line with statutory regulatory requirements.

The Role of School staff

School staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

- All school staff have a responsibility to provide a safe environment in which children can learn.
- The school has a designated safeguarding team who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care. The DSL (and the deputy DSLs) are the most appropriate people to advise on the response to safeguarding concerns.
- All school staff should be prepared to identify children who may benefit from early help as well as to listen to children. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.
- Any staff member who has a concern about a child's welfare should follow the referral processes detailed in this policy. Staff may be required to support social workers and other agencies following any referral.
- The Teachers' Standards 2012 state that teachers, including Heads, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Staff are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. They can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or Deputy DSL.

An effective approach to online safety empowers the school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; (See Digital Safety Policy for further detail)
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Thresholds for Intervention:

Early Support: Early Help Assessment (EHA)

An EHA can be completed when:

- Age appropriate progress is not being made and the causes are unclear or
- The support of more than one additional agency is needed to meet the child or young person's needs.

Staff should discuss children who appear to have additional needs with a member of the Safeguarding Team, the child and parents. The DSL (or Deputy DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate). The school will need to obtain parental/pupil consent for an EHA to be completed. The young person may in certain circumstances be able to give their own consent for an EHA. The process is entirely voluntary and informed consent is mandatory, so families do not have to engage and if they do they can choose what information they want to share. Children and families should not feel stigmatised by the EHA; indeed they can ask for an EHA to be initiated. The EHA process is not a 'referral' process but a 'request for services'. The EHA should be offered to children who have additional needs to those being met by universal services. The practitioner assesses needs using the EHA. Staff may be required to support other agencies and professionals in an EHA, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. The EHA is not a risk assessment. If a child or young person reveals they are at risk of suffering actual or likely significant harm, the practitioner should follow the local safeguarding process immediately.

The DSL or Deputy DSL may need to make a referral directly to other agencies, or request the support of Staffordshire County Council Local Support Team (LST). Staff will follow the guidance of the SSCB Threshold Document - accessing the right help at the right time (www.staffsscb.org.uk). The school will inform the LST Co-ordinator when an EHA is started, and when it is closed, irrespective of whether or not there is an LST worker involved with the family. Additional support may also be provided by Team around the Child (TAC) and Common Assessment Framework (CAF) approaches.

Any child may benefit from early help, but staff should be particularly alert to potential need for early help for child who is disabled or has certain health conditions and has specific additional needs, has SEN, has a mental health need, is a young carer, is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups, is frequently missing/goes missing from home or care, is misusing drugs or alcohol, is at risk of modern slavery, trafficking or sexual or criminal exploitation, has a family member in prison, or is affected by parental offending, is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse, has returned home to their family from care, is showing early signs of neglect or abuse, is at risk of being radicalised or exploited, is at risk of honour based

abuse such as Female Genital Mutilation or Forced Marriage, is a privately fostered child or is persistently absent from education, including persistent absences for part of the school day

Child in Need:

Is this child in need? Section 17 of the Children Act 1989 says: "They are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Such concerns should be passed immediately to the DSL or Deputy DSL. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children's Act 1989."

A child in need referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required. If the Safeguarding team considers that the welfare concerns indicate that this is a 'child in need' or about whom there are concerns relating to radicalisation, one of the Safeguarding Team will normally make this decision in consultation with parents and pupil to make a referral to **Staffordshire Childrens Advice and Support** to request an assessment, however consent from parents and pupil is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Child Protection:

Is this a child protection matter - is the child at risk? Section 47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. School staff do not investigate whether a child has been abused, this is the duty of social workers.

If staff consider the concern is potentially a child protection matter, this should be discussed without delay with one of the DSLs or one of the Deputy DSLs who will refer, if satisfied that the significant harm threshold has been met to **Staffordshire Childrens Advice and Support** or, if applicable, the child's current social worker and to the police where a crime has been committed. If the child lives in an authority outside of Staffordshire, the matter will be referred to the relevant authority, immediately.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under Section 47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development. In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

Guidance on talking to and listening to children: Effective safeguarding practice:

- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or Deputy DSL or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Recognising a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what.
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.
- Where the report includes an online element, being aware of searching screening and confiscation advice- The key consideration is for staff not to view or forward illegal images of a child.
- If possible, managing reports with two members of staff present, (preferably one of them being the DSL or Deputy DSL). However, this might not always be possible; and informing the DSL (or deputy DSL), as soon as practically possible, if the DSL (or Deputy DSL) is not involved in the initial report.

Staff should always be vigilant and always raise any concerns with either the DSL or Deputy DSL.

Remember

If a child chooses to disclose, staff SHOULD:

- be accessible and receptive
- explain that confidentiality cannot be provided
- listen carefully and uncritically at the child's pace
- take what is said seriously
- reassure the child that they are right to tell
- tell the child that you must pass this information on
- make a careful record of what was said, record in the child's own words as much as possible
- make a note of any questions that were put to the child

Staff should NEVER:

- give the impression that the child is creating a problem by reporting the abuse
- take photographs or examine an injury
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions
- make promises to children about confidentiality or keeping 'secrets'
- ask leading questions
- assume that someone else will take the necessary action
- jump to conclusions or react with shock, anger or horror

- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told
- fail to pass the information on to the correct person
- ask a child to sign a written copy of the disclosure
- **Under no circumstances should the member of staff ask students to complete a student statement**

Supporting Pupils at Risk

Children who are abused, or who witness violence, may have difficulty developing self – worth and the ability to view the world positively. Indeed school may be the only secure, stable and predictable element in their lives, but in school their behaviour could be challenging and defiant. Some children who have experienced abuse, may in turn abuse others. This requires a considered, sensitive approach, to enable the child to receive appropriate help and support.

The school will endeavour to support pupils through:

- The curriculum, to encourage self-esteem and motivation.
- The school ethos which promotes a positive, supportive and secure environment, to enable achievement, confidence and happiness.
- Liaison with other professionals, and agencies, who support the pupils and their families.
- Effective supportive communication with parents, if it is in the child's interest to do so.
- The development and support of a responsive and knowledgeable school staff, trained to respond appropriately, in child protection situations.

Procedures for dealing with a safeguarding concern about a child

Any member of teaching staff who has a concern should immediately make an entry on CPOMS, ensuring that the safeguarding category is selected. All other staff must immediately complete a Child Protection – Record of Initial Concerns, located in the SCR (Appendix 2), this must be passed on to a member of the Safeguarding Team or emailed to safeguarding@denstoneschool.net. Wherever possible, there should also be a conversation with one of the DSLs or in their absence one of the Deputy DSLs, who will help staff decide what to do next. Options include managing any support for the child internally via the School's own pastoral support processes, early help assessment or a referral to the Staffordshire **Staffordshire Childrens Advice and Support** Team. Where a child is suffering or likely to suffer from harm a referral to SSCB and if appropriate the police should be made immediately. For referral to **Staffordshire Childrens Advice and Support** phone **0300 111 8007** .Press Option one, there are then six further options

- Press 1-If you are looking for advice and guidance about services in Staffordshire for children and young people
- Press 2-If you have concerns about a child or young person's general wellbeing
- Press 3-If you have a child protection or safeguarding concern and you are worried that a child is suffering harm
- Press 4-If you already have a social worker or are calling about a previous referral
- Press 5-If you are looking for help in the early stages such as school attendance, alcohol abuse or anti-social behaviour
- Press 6-To speak to the adoption and fostering team

or the out of hours emergency number 0845 604 2886. This will then be followed up with written confirmation on the multi-agency referral form within 48 hours. If it is not possible to speak to a member of the Safeguarding team this should not delay appropriate action being taken, the member of staff should contact **Staffordshire Childrens Advice and Support** to discuss concerns. If a child is in immediate danger or is at risk of harm a referral should be made to **Staffordshire Childrens Advice and Support** and/or the police immediately. Safeguarding is everyone's responsibility and **anyone** can make a referral to children's social care. Everyone working at Denstone College has a duty to raise concerns of a safeguarding nature immediately. Staff should not assume a colleague will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate provision of service. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and Section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they may be expected to play in such assessments. If a referral is made by a member of the School to **Staffordshire Childrens Advice and Support** a member of the safeguarding team must be informed as soon as possible. Notes must be made as soon as possible by the member of staff to whom the disclosure is made and certainly within 24 hours of the incident giving rise to the concern. **Under no circumstances should the member of staff ask students to complete a student statement.** Staff do not require parental consent to make referrals to statutory agencies.

This online tool can be used to identify the relevant local children's social care contact number
<https://www.gov.uk/report-child-abuse-to-local-council>

Sometimes staff may have doubts about a child's safety and welfare, things which may seem trivial at the time, could turn out to be vital pieces of information later. If there is no specific incident or information, information should be logged on CPOMS or a child protection initial concerns pro-forma should be completed. An attempt should be made to identify the cause of concern and the pro-forma given to the designated person.

It is important that children receive the right help at the right time to address risks and prevent issues escalating. This includes referring the early signs of abuse and neglect, radicalisation, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

The procedures set out in the document *Working Together to Safeguard Children 2018 (amended 2020)* will be followed in all cases, including dealing with abuse by one or more pupils against another pupil when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' - any such abuse will be referred to the SSCB. In the event of a disclosure about pupil on pupil abuse, all children involved, whether the perpetrator or victim, are treated as being "at risk".

If, following a referral, the child's situation does not appear to be improving, the DSL (or Deputy DSL) should consider following local escalation procedures to ensure their concerns have been addressed and the child situation improves.

Response by the local Authority

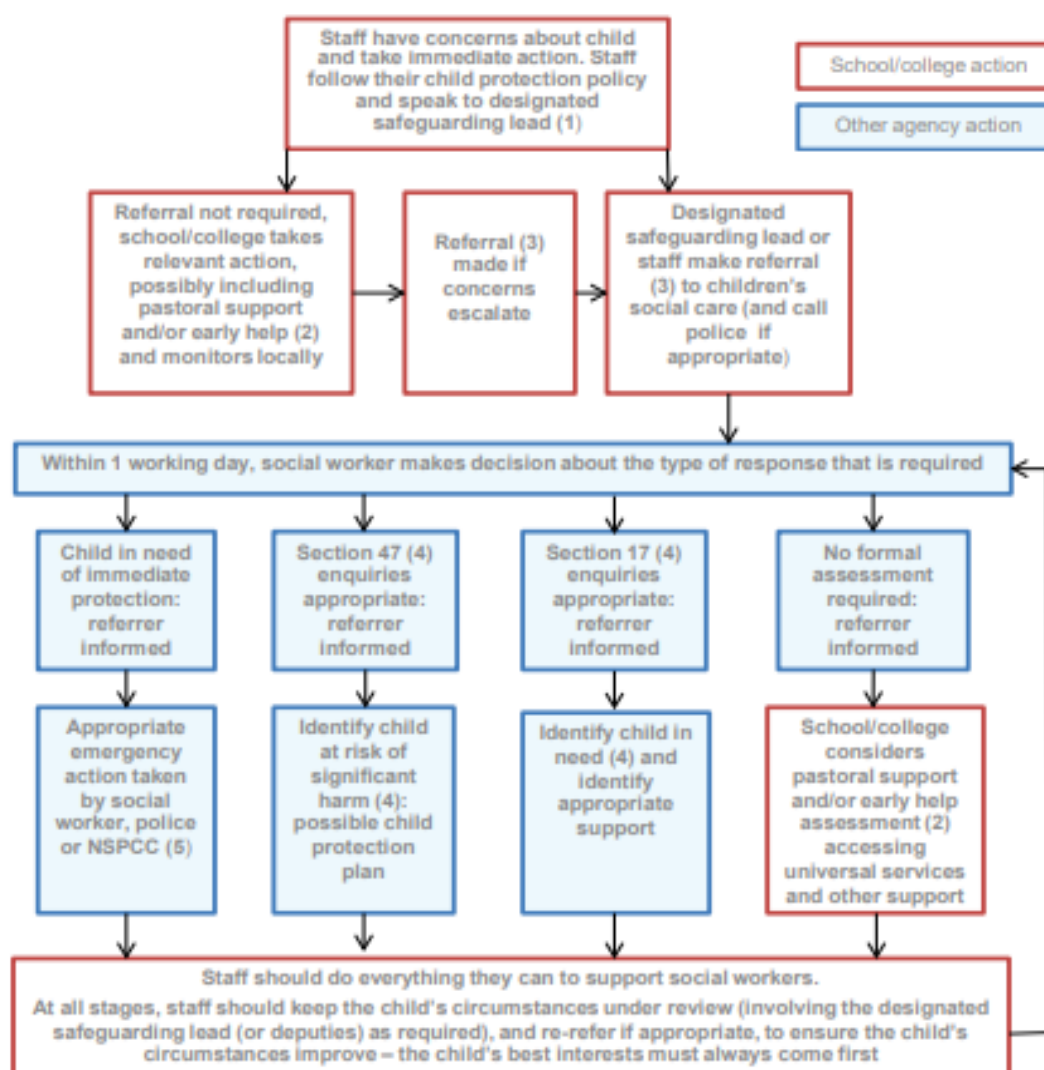
The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. This will include determining whether: •

- the child requires immediate protection and urgent action is required
- whether the child is in need, and should be assessed under section 17 of the Children Act 1989

- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- any services are required by the child and family and what type of services
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The referrer should follow up if this information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL (or deputy DSL) as required). If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Concerns about safeguarding practices within the School.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and know that such concerns will be taken seriously by SMT.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and Code of Conduct, are in place for such concerns to be raised with the School's Senior Management Team. See Employment Handbook for further details.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the School. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Guidance on 'Whether this is a Child Protection Matter'

All teaching and non-teaching staff should be aware of what constitutes abuse and neglect.

A person may abuse or neglect a child by inflicting harm, or by failing to prevent it. Children and young people may be abused in a family or in an institutional or community setting, by those known to them or more rarely by a stranger.

Signs of abuse

All staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition. In most cases multiple issues will overlap with one another. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. Staff and especially the Safeguarding team should consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms takes a variety of different forms and children can be vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation, and serious youth violence. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

If staff have significant concerns about any child they should always speak to one of the School's DSLs or Deputy DSLs without delay. The tell-tale signs of abuse can vary depending on the type of abuse, but there are some common signs. These include:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed
- Children with clothes which are ill-fitting and/or dirty
- Children with consistently poor hygiene
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason
- Children who don't want to change clothes in front of others or participate in physical activities
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who are regularly missing from school

- Children who reach developmental milestones later, with no medical reason
- Children who are reluctant to go home after school
- Children with poor school attendance and punctuality, or who are consistently late being picked up
- Parents who are dismissive and non-responsive to practitioners' concerns
- Parents who collect their children from school when drunk, or under the influence of drugs
- Children who drink alcohol regularly from an early age
- Children who are concerned for younger siblings without explaining why
- Children who talk about running away
- Children who shy away from being touched or flinch at sudden movements

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

¹ **Types of Abuse**

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

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

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 (e.g. 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 online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual Abuse of children by other children is a specific safeguarding issue in education (Peer on Peer abuse).

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), failing to

protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate carers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific Safeguarding Issues

Children potentially at greater risk of harm:

Children who engage in behaviours such as drug taking or alcohol misuse, deliberately missing school and consensual and non-consensual sharing of nudes and semi-nude images or videos can be signs that children are at risk.

Children who need a social worker (Child in Need and Child Protection Plans). Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children requiring mental health support

The School has an important role to play in supporting the mental health and wellbeing of their pupils. 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

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

Any concerns staff have regarding pupils mental health will be referred immediately to the medical team and safeguarding team (In the safeguarding category on CPOMS there is a mental health category), who will take the lead in appropriate next steps. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by discussing with a member of the Safeguarding team. In addition to qualified nursing staff Chris Farman, Karenann Hood, Gareth Jones and Clare Furnival are all trained Mental Health First Aiders.

Research suggests that for young people with mental health problems early and effective intervention will prevent longer term mental health problems.

It is likely that either the pupil will present at the Medical Centre or they will have been referred there by a concerned member of staff. Young people with mental health problems typically visit the GP more than their peers, often presenting with a physical concern. This gives the medical team a key role in identifying mental health issues early and therefore extended appointment time is expected and allocated for pupils where necessary. The pupil can then continue to be assessed and monitored with appropriate appointments with School doctor or medical team.

Assessment of mental health in a pupil involves thinking about several aspects. It is highly likely that medical staff will need to make an initial assessment. Much of this is 'second nature' to nursing professionals but it is helpful to outline key points:

- What has brought the pupil to see you; what has triggered this?
- How do they look? Body language, demeanour, eye contact.
- How are they feeling?
- What are the pupil's current support mechanisms e.g. family structure? (ISAMs family information)
- Are there risk factors that are a concern?

After nursing assessment, any immediate concern for a pupil's mental health would be reported to the school doctor and an appointment made. The Medical Centre staff will liaise with the pupil's parent and key School staff as appropriate. Confidentiality will be maintained within the boundaries of safeguarding the pupil.

When there is an identified cause for concern, and it is deemed to be beneficial for a pupil to be monitored more carefully to safeguard their emotional wellbeing, an Individual Healthcare Plan will be initiated by the Medical team in consultation with the rest of the Safeguarding Team

Children and the court system

Children are sometimes required to give evidence in criminal court, either for crimes committed against them or for crimes they have witnessed. This can be particularly stressful and so the children may need additional pastoral support.

Children with family members in prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health and so may require additional pastoral support.

Drug and Substance Misuse

Where issues come to attention of the school in relation to drugs and substance misuse we will follow the School's Policy on Drugs, Alcohol and Smoking. This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within school. This preventative and supportive approach will sit hand in hand with our statutory functions of child protection in line with established referral procedures and the law of the land.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal exploitation (including county lines) and sexual exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial advantage (such as increased status) of the perpetrator or facilitator and can include violence or the threat of violence. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online

Child Criminal exploitation (CCE) CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for

something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as well as can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims may be missed by adults and professionals, (particularly older children), and so it is essential that staff are alert to this.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money or new possessions;
- children who associate with other children involved in exploitation;
- children 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
- children who regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education

Child Sexual Exploitation (CSE) is a form of sexual abuse CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet) and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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

- children who have older boyfriends or girlfriends.
- children who suffer from sexually transmitted infections display sexual behaviours beyond expected sexual development or become pregnant.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Like all forms of child sex abuse, child sexual exploitation can affect;

- any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse.
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person under the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement- based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Power imbalance can be due to a range of factors such as age, gender, cognitive ability, physical strength, status and access to economic or other resources.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;

Modern Slavery and the National Referral Mechanism

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.

Cybercrime

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
- 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 DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It 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. (Note that Cyber Choices does not currently cover 'cyber-

enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.)

'Honour-based' abuse (HBA) 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 HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take if staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to a member of the Safeguarding team.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

FGM mandatory reporting duty for teachers 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 may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with a member of the Safeguarding Team and follow local Safeguarding Procedures. If a pupil has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the pupil's wishes. **Do not consult or discuss with the pupil's parents or family, or others within the community.** The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Guidance Documents:

- Promoting the Welfare & Safety of Children in Specific Circumstances - Section 4M
- Multi Agency Statutory guidance on Female Genital Mutilation

Further guidance to be found on Female Genital Mutilation Act 2003

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. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

Youth Violence and Gang Activity

"The vast majority of young people and educational establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact." Taken from the Home Office '*Preventing youth violence and gang involvement - Practical advice for schools and schools*'. In light of this we will embrace the Home Office document and follow this guidance which clearly sets out understanding the issue, seeking support, working with local partners, early intervention and legal powers for staff. The School has a duty and a responsibility to protect our pupils and staff and we recognise dealing with violence also helps attainment. To this end we will ensure pupils must, understand very clearly what safe situations are and be highly aware of how to keep themselves and others safe.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These include increased absence from school, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Missing children a child going missing from an education setting is a potential indicator of abuse and neglect. All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. The School holds more than one emergency contact for each child (where reasonably possible) to enable additional options to make contact with an adult when a child missing education is identified. Further information regarding missing children and other specific safeguarding issues can be found via the GOV.UK website and the School's Missing Pupil Policy, which is set against the backdrop of the legal framework of the Children Act 1989 where it is 'reasonable in all circumstances to safeguard and promote the child's welfare'.

Elective Home Education (EHE)

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from School with a view to educating at home, the school, and other key professionals will work together 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.

Preventing Extremism and Radicalisation

Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. The death of members of armed forces is also regarded as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, 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 DSL (or deputy) making a Prevent referral.

As part of our safeguarding ethos we encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the School and where political issues are brought to the attention of the pupils, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils. We also have a duty under the Counter Terrorism Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and where appropriate dealt with in line with our Discipline and Exclusion Policy or the Staff Code of Conduct. We will share information with the **Staffordshire Childrens Advice and Support** Team and/ or the Staffordshire police Prevent team when appropriate. (See Appendix 1 for full contact details) We will also work with Staffordshire's Prevent in relevant circumstances.

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. The School also recognises the importance of effective engagement with parents.

The *Prevent* statutory guidance requires schools to ensure that any visiting speakers who might fall within the scope of the *Prevent* duty, whether invited by staff or pupils, are suitable and appropriately supervised. This means that even in cases where specific vetting checks are not required, action must be taken to ensure that they are suitable. An internet search, testimonial feedback, viewing a speech are examples of how staff can assess suitability. It is necessary to record this information on the spreadsheet. At least one

member of staff must be in attendance during the speaker's speech at the School. (See Visitors Policy for further details)

Children with special education needs and disabilities or physical health issues can face additional safeguarding challenges and can be more prone to peer group isolation or bullying than other children. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEN and disabilities or certain health conditions can be disproportionately impacted by things like bullying without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers. To address these additional needs the School will consider extra pastoral support for children with SEN and disabilities or physical health issues.

Domestic Abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children who witness domestic abuse between family members can be adversely affected. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Operation Encompass

Denstone has signed up to Operation Encompass. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the safeguarding team in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the safeguarding team would make a referral to children's social care if they are concerned about a child's welfare.

Homelessness. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Safeguarding team should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, 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. In most cases School staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL or Deputy DSL should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

Looked after children and previously looked after children. The most common reason for children becoming looked after is as a result of abuse and/or neglect. The School ensures that staff have the skills, knowledge and understanding to keep looked after children safe. In particular, that they have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all staff have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. Karenann Hood is the DSL in the College and Tracey Dvies is the Dsl in the Prep who are appointed to work with local authorities to promote the educational achievement of registered pupils who are looked after. She 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.

Local authorities have on-going responsibilities to the young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. DSL should therefore have details of the local authority Personal Advisor appointed to guide and support the care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

Private Fostering

Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by

someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness;
- Children whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Children staying with families while attending a school away from their home area.

There is a mandatory duty on the school to inform Staffordshire Children's Social Care of a private fostering arrangement by contacting First Response. (**0300 111 8007**), who then has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Peer on Peer Abuse

Keeping Children Safe in Education, 2021 states that "All staff should be aware that children can abuse other children (often referred to as peer on peer abuse) and that it can happen both inside and outside of school or college and online". It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

It is important to be aware that safeguarding issues can manifest themselves via peer on peer abuse, which can happen both inside and outside of school and online. Often there is a gendered nature of peer on peer abuse and it is more likely that girls will be victims and boys perpetrators, however all peer on peer abuse is unacceptable and will be taken seriously. This is most likely, but not limited to bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse), sexual violence (such as rape, assault by penetration and sexual assault), sexual harassment (such as sexual comments, remarks, jokes, online sexual harassment, which may be stand alone or part of a broader pattern of abuse), causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party, consensual and non-consensual sharing of nudes and semi nudes images and or videos, Upskirting (which typically involves taking a picture under a person's clothing 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 and anyone of any gender can be a victim), initiation type violence and rituals and sexting. This may include an online element which facilitates, threatens and/or encourages sexual violence. Initiation/hazing type violence and rituals. (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and

may also include an online element. Such abuse will **never** be tolerated or passed off as "banter" or "part of growing up" and will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm. Denstone takes a Zero tolerance approach to abuse. All children involved whether victim or perpetrator will be treated "at risk" and supported. (See Discipline & Exclusion Policy & Anti- Bullying Policy).

Signs that a child is being abused by their peers

All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected
- physical injuries
- experiencing difficulties with mental health and/or emotional wellbeing
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks suffering from nightmares or lack of sleep or sleeping too much
- broader changes in behaviour including alcohol or substance misuse
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- abusive behaviour towards others

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of peer-on-peer abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Children with particularly vulnerability to abusing or being abused by their peers

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such

abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

Research suggests that peer-on-peer abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up.

Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer-on-peer abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender imbalanced environments.

Definition of Peer on Peer Abuse

There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by the School's behavioural and disciplinary systems. If one child causes harm to another, this should not necessarily be dealt with as abuse: unkindness, physical fighting and harassment between children are not always or inevitably seen as child protection issues. However, it may be appropriate to regard peer on peer behaviour as abusive if harm is caused because:

- There is a **significant power** imbalance between the children concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of peer-on-peer abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups, intellectual ability, physical development, economic wealth, social marginalisation and so on. It is important to note that the perpetrator and/or victim may well be subject to power imbalances with other individuals in an incident of abuse and so it is important to investigate any incident as fully as possible.
- The perpetrator has **repeatedly** tried to harm one or more other children.
- There are concerns about the **intention** of the alleged perpetrator. If evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether severe harm was caused or not.

Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Types of peer on peer abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

Physical abuse e.g. (biting, hitting, kicking, hair pulling)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a child has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

Harmful sexual Behaviours /sexual abuse e.g. (inappropriate sexual language, touching, sexual assault)

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. Harmful sexual behaviour from children is

not always contrived or with the intent to harm others. There may be many reasons why a child engages in harmful sexual behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. Harmful sexual may range from inappropriate sexual language, inappropriate role play, to sexually touching another, causing someone to engage in sexual activity without consent such as forcing someone to strip or touch themselves sexually or engage in sexual activity with a third part or other sexual assault/abuse.

Signs and indicators

Children and young people demonstrate a range of sexual behaviours as they grow up, and this is not always harmful.

Sexualised behaviour sits on a continuum with five stages:

- **appropriate** – the type of sexual behaviour that is considered 'appropriate' for a particular child depends on their age and level of development
- **inappropriate** – this may be displayed in isolated incidents, but is generally consensual and acceptable within a peer group
- **problematic** – this may be socially unexpected, developmentally unusual, and impulsive, but have no element of victimisation
- **abusive** – this often involves manipulation, coercion, or lack of consent
- **violent** – this is very intrusive and may have an element of sadism

Bullying (physical, name calling, homophobic)

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both children who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

An Imbalance of Power: Children who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

Repetition: Bullying behaviours happen more than once or have the potential to happen more than once. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose. (See Anti Bullying Policy)

Cyber bullying

Cyber bullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass, threaten or intimidate someone for the same reasons as given above. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 (section 1) which states that electronic communications which are indecent or grossly offensive, or convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

If the behaviour involves the use of taking or distributing indecent images of children under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support children may require in these instances, the school will have no choice but to involve the police to investigate these situations. (See Digital safety Policy)

Sexting (youth-produced sexual imagery) is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated. However, Denstone College takes a pro-active approach in its ICT and PSHE programmes to help students to understand, assess, manage and avoid the risks associated with 'online activity'. The School recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

Sexting (youth-produced sexual imagery) includes the sending of sexually explicit photos, images, text messages, or e-mails by using a phone or other mobile device. These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession indecent images of a person under 18, or distributing them to someone else, children are unlikely to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. There are many different types of sexting and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that the School applies a consistent approach when dealing with an incident to help protect children. For this reason, the DSL (or Deputy) needs to be informed of any sexting (youth-produced sexual imagery) incidents. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response (see Discipline & Exclusion Policy).

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour in order to gain power and maintain control over the partner.

Issues surrounding Honour Based Violence (HBV), Forced Marriage and Radicalisation may also be relevant where coercion or power imbalances are involved between peers. It is also important to recognise that peer on peer abuse may well involve pupils here at the School and children in other contexts, thus making a full range of abuse types possible. When dealing with any disclosure of abuse it is important to remember the three bullet points above regarding power, frequency and intention. The extent to which any victim has given consent is also important.

Expected action taken by all staff to peer on peer abuse

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred and before the children may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example, do not use the word perpetrator, this can quickly create a blame culture and leave a child labelled.

In all cases of peer on peer abuse it is necessary that all staff are trained in dealing with such incidents, talking to children and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

Preventative Strategies to minimise the risk of peer on peer abuse

In the broadest sense, the School's Pastoral, Academic and Co-Curricular aims create and sustain an environment that helps to minimise the risk and occurrence of peer on peer abuse. The School also looks to take a proactive, preventive and educative approach to safeguarding issues with its staff and pupils.

Opportunities are sought to give teaching and learning opportunities to our pupils, within the context of PSHE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. The possible avenues for such education to take place, including education about abusive behaviour, include the following:

- Assemblies
- Pastoral discussion between pupils and Teachers, Tutors, Heads of House, Safeguarding Team , Medical Centre, SMT
- Engagement between pupils and the wider pastoral team, including Medical Centre staff, and School Counsellor
- PSHE presentations from external speakers
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom)
- Working with Governors, Senior Management Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships
- Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to
- Responding to cases of peer-on-peer abuse promptly and appropriately.

Denstone College will seek to ensure that it has an open environment where pupils feel safe to share information about anything that is upsetting or worrying them. To enable such an open and honest environment we will aim to make sure that all staff feel confident and able to talk about issues and challenge the perceptions and attitudes of children including where relevant their use of inappropriate language and behaviour towards one another, for example stereotyping of protected characteristics. Staff will never dismiss issues as “banter” or “growing up” or compare them to our own experiences of childhood, when the world was very different. All staff must consider each situation in its own right before taking

action. If we minimise the concerns raised it may result in a child seeking no further help or advice and their predicament becoming far worse.

Pupils should be aware that there are a variety of ways in which they can express their views and feelings on any pastoral matter; to access support in order to prevent abuse from occurring, to report abuse that is happening, and to find ongoing support after abuse has been identified. Pupils are able to seek support from staff if they feel they are being abused or that one of their peers is at risk from abuse or peer on peer abuse. Main School pupils are also able to email shareit@denstoneschool.net to voice any concerns.

Multi-agency working regarding Peer on Peer abuse

The School actively engages with its local partners in relation to peer-on-peer abuse, and works closely with SSCB. The relationships the School has built with SSCB is essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse. SSCB will help the School

- to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
- to ensure that our pupils are able to access the range of services and support they need quickly
- to support and help inform our local community's response to peer-on-peer abuse
- to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

The School actively refers concerns/allegations of peer-on-peer abuse where necessary to SSCB via **Staffordshire Childrens Advice and Support** and/or other relevant agencies. This is particularly important because peer-on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

Procedures Adopted when a Disclosure of Peer on Peer Abuse is made

The following general principles and guidelines should be followed: Initial response

- Any direct disclosure by a pupil of an incident of abuse should be taken very seriously and managed sensitively. Basic principles of listening sensitively, providing reassurance, not asking leading questions and not guaranteeing confidentiality should be remembered. Gather the facts and consider the Intent, has this been a deliberate or contrived situation for a child to be able to harm another?
- All incidents should be responded to in line with the Safeguarding Policy Clearly recorded clearly and reported to a member of the safeguarding Team without delay. See Guidance on talking to and listening to children: Effective safeguarding practice). All information regarding the matter will be recorded on CPOMS.

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of all children affected e.g. victim, alleged perpetrator and any other children affected. DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult SSCB on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum as opposed to inappropriate or problematic (see below), the DSL should contact Staffordshire **Staffordshire Childrens Advice and Support** Team (See Appendix 1 for contact details) immediately, and in any event within 24 hours of the DSL becoming aware of it.

| Normal | Inappropriate | Problematic | Abusive | Violent |
|---|--|---|---|---|
| <ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making | <ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal | <ul style="list-style-type: none"> • Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity | <ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence | <ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism |

Source: Hackett's Continuum

The DSL will discuss the allegations/concerns with **Staffordshire Childrens Advice and Support** and agree on a course of action, which may include:

A - Manage internally with help from external specialists where appropriate and possible Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

B – Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

C – Refer child/children to children's social care for a section 17 and/or 47 statutory assessment as a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

D – Report alleged criminal behaviour to the Police Alleged criminal behaviour will ordinarily be reported to the Police, however, there are some circumstances where it may not be appropriate to report such behaviour. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

Points to consider regarding peer on peer abuse:

What is the age of the children involved? How old are the children involved in the incident and is there any age difference between those involved?

Where did the incident or incidents take place? Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

What was the explanation by all children involved of what occurred? Can each of the children give the same explanation of the incident and also what is the effect on the children involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one child different from another and why?

What is each of the children's own understanding of what occurred? Do the children know/understand what they are doing? For example, do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the child's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the child have understanding of the impact of their behaviour on the other person?

Repetition: Has the behaviour been repeated on more than one occasion? In the same way it must be considered has the behaviour persisted after the issue has already been discussed or dealt with and appropriately resolved?

Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the child who has been harmed

What support they require depends on the individual child. It may be that they wish to seek counselling or one to one support via a member of the School's Pastoral Team. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In that case, it is necessary that the child continues to be monitored and offered support should they require it at a future time. If the incidents are of a bullying nature, the child may need support in improving peer groups/relationships with other children or some restorative justice work with all those involved may be required. Other interventions that could be considered may target a whole class or year group, for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of assemblies, PSHE, that certain issues can be discussed and debated more frequently.

If the child feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have a key contact that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the child who has displayed harmful behaviour

In this circumstance it is important to find out why the child has behaved in such a way. It may be that the child is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as counselling or one to one support via a member of the School's Pastoral Team may also be necessary. Particular support from identified services may be necessary through an early help referral and the child may require additional support from family members.

Once the support required to meet the individual needs of the child has been met, it is important that the child receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the child they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the child to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service).

Even following the conclusion of any investigation, the behaviour that the child has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be

completed via a multi-agency response to ensure that the needs of the child and the risks towards others are measured by all of those agencies involved including the child and their parents. This may mean additional supervision of the child or protective strategies if the child feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or suspension for a period of time to allow the child to reflect on their behaviour.

After care

It is important that following the incident the children involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the children do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the children following the incident(s) are imperative.

Child on Child Sexual violence and sexual harassment.

It is important that School staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. We will respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school or school premises, and or online. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware of, it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff are aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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 (we should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people taking and sharing nude photographs of under 18 year olds is a criminal offence, sharing of unwanted explicit content, upskirting sexualised online bullying, unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats.

Responding to the report of Sexual violence and sexual harassment

The School will respond on a case-by-case basis, with the DSL (or a deputy DSL) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required. All victims will be taken seriously, supported and kept safe.

- If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible. Where the report includes an online element, being aware of searching screening and confiscation advice and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In

some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker.

Remember

- Sexual violence and abuse can occur between two children of any age and sex and within an intimate relationship
- A group of children may sexually assault or sexually harass a single child or group of children
- Abuse that occurs online or outside of school will be treated equally seriously
- That safeguarding incidents and behaviours can be associated with factors outside of school, including intimate personal relationships.
- Children who are victims are likely to find the experience stressful and distressing, which is likely to adversely affect their educational attainment and will be exacerbated if the alleged perpetrator attends the same school.

Risk Assessment Following a report of sexual violence

Following a report of sexual violence, the DSL (or deputy DSL) should make an immediate risk and needs assessment, considering: the victim, especially their protection and support, whether there may have been other victims, the alleged perpetrator(s) and all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from any future harm.

Risk assessments will be recorded and kept under review. At all times, the school will actively consider the risks posed to all their pupils and students and put adequate measures in place to protect them and keep

them safe. The DSL (or deputy DSL) should ensure they are engaging with children's social care and specialist services as required.

The School will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school staff
- contextual safeguarding issues

As always, all staff should act in the best interests of the child sexual violence and sexual harassment is not acceptable and will not be tolerated.

Action following a report of sexual violence and/or sexual harassment

Important considerations will include:

- the needs and wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- the nature of the alleged incident(s), including: whether a crime may have been committed or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- 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)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other children or school staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, School should follow general safeguarding principles as set out in *Keeping Children Safe in Education 2021*. The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Four scenarios for schools and schools to consider when managing any reports of sexual violence and/or sexual harassment. (See *Keeping Children Safe in Education 2021* for further details)

1. Manage internally – the school manages incidents.
2. Early help – multi-agency early help
3. Referrals to children's social care
4. Reporting to the police – in parallel to children's social care

It is unlikely that a child will be on police bail with conditions attached. There may be delays in any criminal case, and in such instances the School should not wait for the outcome before protecting the victim, alleged perpetrator and other children in the School. The DSL will complete a risk management plan. The guidance makes it clear that the School needs to consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at school. The School needs to manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves.

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

Contextual safeguarding

Safeguarding incidents and behaviours can be associated with factors outside School and can occur between children outside School. All staff need to consider the context within which such incidents/behaviour occur. This is known as contextual safeguarding, meaning that assessment of the children should consider whether wider environmental factors are present in a child's lives that are a threat to their safety and/or welfare.

Procedures - Dealing with an allegation of abuse against members of staff (including supply staff contractors and volunteers) or the Head

If an allegation is made concerning a member of staff (including supply staff, contractors and volunteers) , who is currently working in any Educational establishment regardless of whether the School is where the alleged abuse took place, the procedures set out in *Working Together to Safeguard Children 2018 (amended 2020)*, *Keeping Children Safe in Education 2021*, and the Employment Manual will be followed. Parents/guardians will be informed of the allegations involving their child before the end of the school day. The child and his/her family will be supported throughout the procedure. Suspension is not automatic, and proceedings will be without prejudice. If the member of staff is from a supply agency the school will still take the lead while keeping the supply agency fully informed.

Staff have a professional duty to report concerns about the conduct of other adults working in the School if there are indications that a child or children could be at risk of harm. Adults working in this School are encouraged to raise any concerns about conduct or practice so that this can be addressed appropriately. When an allegation against an adult or volunteer in School, including the DSL has been made the Head must be informed immediately, in the absence of the Head, the Chair of Governors must be informed. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of

the Governors without notifying the Head first. If there is considered to be a conflict of interest in reporting the matter to the Head of Chair of the Governors the matter should be referred directed to the LADO via the Staffordshire Childrens Advice and Support.

There are the two levels of allegation/concern: Allegations that may meet the harms threshold and allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

Allegations that may meet the harms threshold. This will be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors has: behaved in a way that has harmed a child, or may have harmed a child and/or possibly committed a criminal offence against or related to a child and/or behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk

Initial response to an allegation In the first instance, the Head, or where the Head is the subject of an allegation, the Chair of Governors (referred as the case manager), will consult the LADO and as appropriate the police immediately. The Head / Chair of the Governors will contact the **Staffordshire Childrens Advice and Support** team within 24 hours of any situation arising on **0300 111 8007**, if the concern or allegation is urgent and outside of office hours the Head will contact the Emergency Duty Team on 0845 6042 886. The Head / Chair of the Governors will alert the call taker in the **Staffordshire Childrens Advice and Support** Team that this is a position of trust issue, and after taking initial details the call taker will ensure that the matter is passed promptly to the Staffordshire LADO Duty Officer who will assist in initiating any additional safeguarding activities.

These discussions with the LADO should be recorded in writing and any conversations between either the child or parents agreed with the LADO. In the case of serious harm, the police should be informed at the outset. Allegations of abuse made against staff, whether historical or contemporary, should be dealt with by the Head and not the DSLs.

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse, where a child has been harmed, there is an immediate risk of harm to a child or the situation is an emergency to Staffordshire Childrens Advice and Support and as appropriate to the Police immediately.
2. Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, the school will:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

The School must not undertake its own investigations of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. However the school should make basic enquires to establish facts to help them determine where there is a foundation for any allegation, such as was the individual in school at the time of the allegation, did the individual come into contact with the child, do we have any CCTV footage, in line with SSCB procedures.

The LADO should be informed within one working day of all allegations that come to the Head's attention.

Discussions with the LADO will consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. These discussions should be recorded by the Head in writing and communication with both the individual and parents of the child/children agreed with the LADO. This initial discussion will establish the validity of any allegation under SSCB procedures and if a child protection safeguarding referral is required due to a child having suffered or being at risk of suffering 'significant harm' If this is the case a referral will be raised with the relevant Safeguarding team and a section 47 child protection strategy meeting will be convened that the Head / Chair of the Governors should attend.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to children's social care. The DSL will take the lead in supporting the child(ren) involved and the parents or careers of any child involved.

If an individual child is not identified but there are concerns about the behaviour of a person in a position of trust which require consideration by other agencies or organisations, the LADO will convene a Joint Evaluation Meeting (JEM) to consider the issues and any action required.

The decision of the strategy/joint evaluation meeting could be:

- investigation by children's social care
- police investigation if there is a criminal element to the allegation
- single agency investigation completed by the School which should involve the HR Manager

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

No further action-Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

Further enquiries-Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance to school when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

If the matter does not meet the threshold for intervention by other agencies, but concerns remain about the conduct of a person in position of trust working with children, the School will take appropriate investigatory and, if appropriate, disciplinary action. Referrals to the Disclosure and Barring Service (DBS) will be made by the School when appropriate, in line with current guidance.

An accurate record of all that has happened must be made to include facts of any injury, timings, explanations, persons present at time and action taken by the School. If an allegation is made against a teacher, the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. In response to an allegation staff suspension will not be the default option. Suspension should be considered only in a case where there is cause to suspect a child or other children at the School is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the School or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the LADO. In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the School, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work. The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the Police and LADO have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension.

Based on advice from the school's HR Manager and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff: redeployment within the school so that the individual does not have direct contact with the child or children concerned, providing an assistant to be present when the individual has contact with children, redeploying to alternative work in the school so the individual does not have unsupervised access to children, moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended. If

immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by the case manager. This should also include what alternatives to suspension have been considered and why they were rejected. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. Due weight will be given to the views of the LADO, *Keeping Children Safe in Education 2021 and Working Together 2018 (amended 2020)*.

The school has a duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the SSCB or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support.

It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the governing bodies of the school who are the employers of staff at the School. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the LADO should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the decision regarding suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment. Where an allegation is made against a member of boarding staff living on site, should this lead to suspension pending an investigation of a child protection nature they will need to find alternative accommodation away from the boarders.

Parents or Carers of the child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or social services need to be involved the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to parents or carers. Parents or carers should also be kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but parents or carers of the child should be told the outcome in confidence. Parents or carers should be made aware of the requirement to maintain confidentiality about allegations made against teachers whilst investigations are ongoing (as set out in section 141F of the Education Act 2002 paragraphs 372-380)

If the allegation is substantiated and the person is dismissed, resigns, or otherwise ceases to provide his or her services, or the employer ceases to use the person's services. The school will fulfil its legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

Whether or not a member of staff offers to resign should not prevent the allegation procedure reaching a conclusion. The School will fulfil its duty to report promptly to the DBS, within one month of leaving the School any person, whether employed, contracted, a volunteer or student, whose services are no longer used or they are removed from regulated activity because he or she is considered unsuitable to work with children (ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer

using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering). The school will also make a referral to the Secretary of State via Teaching Regulation Agency (TRA) if a teacher including a supply teacher, is dismissed or the school ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

From 1st October 2012, there have been restrictions on the reporting or publishing of allegations against teachers and the School must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case. The Head / Chair of the Governors should take advice from the DSL, police and SSCB to agree the following: who needs to know, exactly what information can be shared, how to manage speculation, leaks and gossip; what, if any information can be reasonably given to the wider community to reduce speculation; and how to manage press interest if and when it should arise.

Where a case of “whistle blowing” has been made staff reporting incidents in the public interest will have immunity from retribution or disciplinary action. In essence the School has a culture of safety and of raising concerns, 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 School’s Safeguarding regime, provision for mediation and dispute resolution where necessary. There is transparency and accountability in relation to how concerns are received and handled. However, if staff feel unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels include the NSPCC whistleblowing on 0800 028 0285 or email help@nspcc.org.uk. And advice is available at www.gov.uk/whistleblowing Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Following a criminal investigation or a prosecution

The police should inform the LADO and the employer immediately when:

- a criminal investigation and any subsequent trial is complete,
- it is decided to close an investigation without charge, or
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children’s social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Supply teachers

In some circumstances the School will have to consider an allegation against an individual not directly employed by us, where its disciplinary procedures do not fully apply. Whilst the School is not the employer of supply teachers, it will ensure allegations are dealt with properly. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without first liaising with the local authority designated officer (LADO) regarding next steps and to determine a suitable outcome. The Governing body should discuss with the agency or agencies where the supply teacher is working across a number of schools or colleges whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children’s social care. The School will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information

required by the LADO as part of the referral process. Supply teachers, whilst not employed by the School, are under the supervision, direction and control of the governing body when working in the School. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation. When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Governors

If an allegation is made against a governor, the school will follow SSCB procedures. Where an allegation is substantiated, the School will follow the procedures to remove them from office.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. The LADO will need to keep a record of how the matter was investigated and how the outcome to the allegation was reached. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned where agreed by children's social care or the police and a declaration on whether the information will be referred to in any future reference. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The school has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the inquiry. All other records should be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated or malicious, the DSL should refer the matter to SSCB to determine whether the child concerned is in need of services or may have been abused by someone else. Pupils that are found to have made malicious allegations are likely to have breached School behavior policies. The School will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the DSL. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

The following definitions should be used when determining the outcome of allegation investigations:

Substantiated: there is sufficient evidence to prove the allegation.

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

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.

If there is a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school.

Record Keeping

For all allegations other than of those found to be malicious or false, the following information must be kept on the file of the person accused

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, the decision reached and whether the outcome was substantiated, unsubstituted or unfounded
- a copy provided to the person concerned, where agreed by SSCB or the Police
- a declaration on whether the information will be referred to in any future references.

References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations will be included in references, provided that the information is factual and does not include opinion.

Learning Lessons

The LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases the case manager should consider the facts and determine whether any improvements can be made.

Non recent allegations

Where an adult makes an allegation to a school or school that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with SSCB procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

Concerns that do not meet the harm threshold

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low level concerns

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Our culture is such that all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately.

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 school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour 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; or,
- using inappropriate sexualised, intimidating or offensive language.

The importance of sharing low-level concerns is to create and embed a culture of openness, trust and transparency in which the school’s values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Sharing low-level concerns

Low-level concerns about any member of staff should be reported to the Head. Low Level concerns regarding the Head should be reported to the chair of the Governors. This includes where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, that concern should be shared with the Head, and recorded and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns should be recorded in writing by the Head. The record should include details of the concern, the context in which the concern arose, any evidence collected by the DSL where the concern has been raised via a third party, the decision categorising the type of behaviour, action taken and the rationale for the decisions and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

These records will be kept confidential, by the Head and held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a

course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. This information will be retained until the individual leaves their employment.

Responding to low-level concerns

Concerns about safeguarding should be reported to the Head. If the concern has been raised via a third party, the Head will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously or to the individual involved and any witnesses.

The information collected to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for any decisions and action taken.

References

Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference

Professional Confidentiality

The only purpose of confidentiality in Safeguarding Children is if it benefits the child. A member of staff must never guarantee confidentiality to a pupil with regard to safeguarding issues. This could lead to a breakdown of trust, and potentially compromise the staff member's well-being and safety. A suggested form of words that may help when talking to children is as follows:

"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and to whom."

Staff should explain to the child how information may be shared and why and seek their agreement. This involves only sharing information with those who need to be involved, such as the DSL (or Deputy DSL) and children's social care. The exception to this is when to do so would put the child or others at increased risk of significant harm or an adult at risk of serious harm, or if it would undermine the prevention, detection or prosecution of a serious crime.

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) (*amended 2020*). The school works closely with SSCB and where appropriate other local authorities.

As a School we recognise the importance of information sharing between professionals and local agencies. The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care.

The law requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate. Therefore, if the Police or Social Care/Services are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt from the

County Legal Services Department. The DSLs or Deputy DSLs will invoke the local agreed guidelines and procedures of referral. Staff will be informed of relevant aspects in respect to safeguarding children on a “need to know” basis only. Any information shared with a member of staff must be treated as confidential.

Record Keeping

Well-kept records are essential to good practice. Staff should be made aware of the need to record any concerns about children, the status of such records, and when to pass them over to other agencies. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and include the reasons for decisions made. These records will be reviewed regularly by the Safeguarding team so that any concerning patterns of behaviour can be spotted.

Records should:

- state who was present, time, date and place
- use the child’s words wherever possible
- be factual/state exactly what was said
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation
- Include a clear and comprehensive summary of the concern
- be written in ink/typed and signed and dated by the recorder and passed to one of the DSL
- Details of how the concern was followed up and resolved including notes of any action taken, decisions reached and the outcome.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing

A file note will be entered into the pupil’s central file highlighting that there is a safeguarding concern. This will alert staff preparing records for school leavers, that there is information held within the Safeguarding file.

All information is held on CPOMS or in a confidential file and locked away. If a child’s file is taken off premises it is signed for and its return monitored.

Information sharing

Information sharing is vital in identifying and tracking all forms of abuse and neglect and in promoting children’s welfare, including their educational outcomes. As part of meeting a child’s needs, it is important for governing bodies to recognise the importance of information sharing between professionals and local agencies and ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). School staff should be proactive in sharing information within the School and with SSCB, other organisations, agencies and practitioners as required. Staff should also be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to children’s social care. Guidance in *Working Together to Safeguard Children 2018 (amended 2020)* will be followed. The General Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully.

The Governing body will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as ‘special category personal data’.

- understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils’ personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools’ obligations under the Data Protection Act 2018 and the GDPR. Where in doubt the School will seek independent legal advice. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

As an education establishment we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. Data protection fears MUST NOT be a barrier to information sharing, as the safety of the child is of the utmost importance.

Transfer of files

Where children leave the school or school (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the DSL will consider if it would be appropriate to share any additional information with the new school or school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or school. For example, information that would allow the new school or school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

A copy of the sent file will be kept as dormant, in case the file is lost in transit. If the original files are physically handed to the receiving school by the sending school and a record of all files transferred is fully documented and signed off by both parties, as having been sent and received, then copying the documents would not be necessary. If this is not possible, the security of the file must be considered e.g. secure courier. The School should copy the file and the original documents should be sent under separate cover to new school whilst the child is still under 18. The copies should be shredded once confirmation is received from the receiving school that all relevant documents have arrived. The School should retain a record of the confirmation and a record of when the files were shredded. When it is known a child will be leaving the school the DSL will be proactive and consider if it would be appropriate to share information with the school in advance of the child leaving, for example where it would allow the new school to continue to support victims of abuse and have support in place for when the child arrives.

When a pupil leaves the School and is not moving to another school, relevant information will be shared with local social services. Child protection information will be kept by the School until the child’s 25th birthday. If a pupil should die before their 25th birthday, any files will be disposed of appropriately. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

Attendance at Safeguarding Conferences

One of the DSLs or Deputy DSLs will attend Safeguarding Strategy meetings called in respect of a pupil. They may be accompanied by other relevant staff (e.g. the pupil’s Head of House, Head of School or tutor)

if necessary. Staff attending such meetings will be offered support, and access to appropriate counselling if they so wish.

Safer Recruitment (See Employee Recruitment Policy for further details)

When recruiting new volunteers, staff, contractors and staff of contractors the School follows the guidance given in the *Keeping Children Safe in Education 2021*, and the SSCB guidelines. The School is committed to safer recruitment and ensures that DBS and pre-appointment checks are undertaken in line with the School policy and that references are obtained and that qualifications are verified and prohibition checks are completed as necessary, dependant on the role and duties of the applicant.

Any staff member, volunteer or governor who becomes the subject of a police investigation or who are cautioned or charged with a criminal offence, in relation to physical or sexual offences against adults or children must inform the Head. Staff must also disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children whether received before, or during their employment at the School. The Head will discuss any potential safeguarding matters with the LADO and any required action will be agreed.

Any staff member, volunteer or governor whose own children become subject to child protection investigations must inform the Head. The Head will discuss with the LADO via the **Staffordshire Childrens Advice and Support** Team procedures for dealing with allegations against persons who work in a position of trust with children. Appropriate action will be agreed.

Staff Protection against allegations of abuse:

Staff should seek to keep personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working one-to-one with children:

- Work in a room where there is a glass panel in the door or leave the door open.
- Make sure that other adults visit the room occasionally.
- Avoid working in isolation with children unless thought has been given to safeguards, particularly regarding one-to-one teaching. Advice can be sought from the DSL (or Deputy DSL).
- Avoid giving out personal mobile phone numbers or private e-mail addresses.
- Avoid giving pupils lifts home in your car.
- Avoid meeting pupils outside School.
- Avoid chatting to pupils via social media.

Given that some staff are involved in Boarding there may be occasions when some of the above may be necessary but in all cases due care and consideration should be given to ensure staff and pupil safety. If in doubt staff should liaise with a member of the Safeguarding team.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent but under 18 years of age.

Any use of physical force or restraint against pupils will be carried out and documented in accordance with the Restraint Policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed.

Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment.

Dissemination of Policy and Review

This policy is published on the School website. All members of staff will be expected to read the policy within their first month of employment. This policy and procedures will be reviewed annually by SMT, and will be updated whenever necessary, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. . The governing body undertakes an annual review, each February of the School's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged, which is signed off by the Chair of the Governors. This policy should be considered alongside other related policies. If there is a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. Any deficiencies or weaknesses identified in child protection arrangements will be remedied without delay.

Appendix 1

School's Safeguarding Team- Designated Safeguarding Leads

Angela Smith Tel: 07976 710272 Karenann Hood Tel: 07791 339156
Tracey Davies Tel: 01889 590484

Deputy Designated Safeguarding Leads

Gill Lear Tel: 07976 710272 Richard Neal Tel: 07871 416877
Michelle Edge Tel: 07976 710272 Jackie Plewes Tel: 07538 251146
Gareth Jones Tel: 07917198266 Claire Clews Tel: 07988640954

Contact Details for Referrals Staffordshire

Staffordshire Childrens Advice and Support - Tel: 0300 111 8007 Email: frist@staffordshire.gov.uk
Central Referral Unit - Tel: 0300 123 44 55
Emergency Duty Service - Tel: 0845 604 2886 Out of hours- Tel: 0845 604 2889

Stoke on Trent

Stoke on Trent Advice and referral team (The Regent Centre, Hanley) Tel: 01782 235100
Emergency Duty team Tel: 01782 234234

Pupils' Welfare Issues

Local Authority Designated Officer (LADO) Mandy Parkinson, Lisa Dada and Paul Davies
Contact via First Response Tel: 0300 111 8007
Staffordshire County Council Educational Safeguarding Advice Tel: 01785 895836
Email esas@staffordshire.gov.uk

Website [Staffordshire Education Safeguarding Advice](#) Staffordshire Vulnerable Adults referral contact details (for schools where pupils may be over the age of 18 years and have a physical or sensory impairment; drug or alcohol problems; mental health problem; or learning disability and may not be able to protect themselves from harm or abuse) Tel: 0845 604 2719 or Emergency Duty Service number above.

The online tool which directs to the relevant local children's social care contact number
www.gov.uk/report-child-abuse-to-local-council

Concerns about an individual in relation to extremism or radicalisation or FGM

Local Police Tel: 101

Staffordshire County Council's Safer Communities Team Tel: 01785 854428

Email: becky.murphy@staffordshire.gov.uk

Staffordshire Police Prevent Co-ordinator Sgt. Calum Forsyth Tel: 01785 232054

Prevent Team Tel: 01785 238239 or 01785 233109 Email: prevent@staffordshire.pnn.police.uk

DfE dedicated helpline for non-emergency advice for staff & governors Tel: 020 7340 7264

Email: counter-extremism@education.gov.uk.

Whistleblowing

NSPCC Whistleblowing Helpline Tel: 08000280285 Email: help@nspcc.org.uk

And advice is available at www.gov.uk/whistleblowing

National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Forced Marriage Unit

Tel: 020 7008 0151 Email fm@fco.gov.uk.

Operation Encompass

Operation Encompass Teachers National helpline Tel: 0204 513 9990

NSPCC helpline to provide both children and adults who are victims of sexual abuse in schools support and advice including how to report incidents to the police. Tel: 0800 136 663

CONFIDENTIAL: Safeguarding Record of Initial Concerns

| | | | | | |
|---|--------------------------------|--------------|---|------------------------|-------|
| Pupils Full Name | | | | Boarding Status | B / D |
| Address (inc postcode) | | House | | D.O.B | |
| | | | | Age | |
| | | | | | |
| Nature of concern (Brief outline, record in detail below) | | | Date that concern was raised | | |
| | | | Time that concern was raised | | |
| | | | | | |
| Name of person raising concern | | | Relationship to child/young person | | |
| Information passed to? | AS/ KH/GAJ/RN /JHP/GL/ME/TD/CC | | On what date? | | |
| <p>Detail of concern (Please include as much detailed information in this section as possible, including any background information about the child . Remember - the quality of your information will inform the level of intervention initiated. If necessary, attach additional sheet)</p> | | | | | |
| Signature of person raising concern | | Date | | Time | |

Safeguarding Notes removed from site

| | | | |
|---------------------------|--|--------------|--|
| Pupils Full Name | | | |
| Alias/Also know as | | D.O.B | |

| Reason for removal from site | Time and date removed | By Whom | Time and date returned | By whom |
|-------------------------------------|------------------------------|----------------|-------------------------------|----------------|
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Transfer of Pupil Safeguarding Forms

| | | |
|---|---------------|------------------------------|
| Pupils Full Name: | | |
| D.o.B.: | | |
| Name and address of receiving school/school | | |
| Date child on new school/school roll: | | |
| Name of Designated Safeguarding Lead in receiving school/school | | |
| Date(s) of telephone discussion or meeting between designated safeguarding leads | | |
| Date file confidentially passed (or sent by secure mail) to Designated Safeguarding Lead in Receiving school/school | | |
| Name, Designation, Signature & date file Received at new setting | Name | Signature |
| | Designation | |
| | Date received | |
| Signature of (current) school Designated Safeguarding Lead and date form completed: | Name | Date form returned complete: |
| Signature of person shredding the copy | | Date file shredded |

A copy of the welfare file must be kept until file has been received by the new setting and a signature obtained from an appropriate representative (usually the Designated Safeguarding Lead) in the Receiving School/School.
A copy of this form must be retained.



Safeguarding File Note for Heads Office

Name _____

Date _____

There is a safeguarding issue relating to this child which is recorded on CPOMS.

Appendix 3: Role of the Designated Safeguarding Leads and Deputy Designated Leads

The Governing body committees should ensure an appropriate senior member of staff, from the School leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given additional time, funding, training, resources and support to they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy Designated Safeguarding - any deputies should be trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working With others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the Head to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the "case manager" and the LADO at the local authority for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, Senior Mental health leads and SENCO on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these

issues might be having on children's attendance, engagement and achievement at school This includes: ensuring that the school knows its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker, reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Raise Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and school leadership staff.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and schools should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in schools, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or school in advance of

a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or school. For example, information that would allow the new school or school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Availability

During term time the DSL (or a deputy) should always be available (during School hours) for staff in the school to discuss any safeguarding concerns. Out of hours/Out of term activities contact is via phone to one of the DSL or Deputies.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special 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
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and

digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to ensure that staff are supported during the referral process and support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2021, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and school, and with other schools and schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.