



# The Manor Trust Safeguarding and Child Protection policy

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|-----------------|-----------------|--------------|
| Approved by     | The Trust Board | October 2023 |
| Next review due |                 | October 2024 |

# CONTENTS

|  | <b>Page</b> |
|--|-------------|
| <b><u>Key contacts</u></b>   | <b>1</b>    |
| <b><u>CORE OPERATIONAL AND POLICIES AND PROCEDURES</u></b>   | <b>2</b>    |
| <b>Purpose and aims of this policy</b>   |             |
| <b><u>PART 1      Safeguarding for all staff</u></b>   | <b>3</b>    |
| Induction and Training   |             |
| <b><u>Safeguarding Children</u></b>  | <b>4</b>    |
| Safeguarding is about every child  |             |
| Early Help cases   |             |
| Child protection is the risk of significant harm   |             |
| Referral for statutory social work services  |             |
| Children who need a social worker  |             |
| <b><u>Child protection procedures</u></b>  | <b>7</b>    |
| Role of the school/college   |             |
| Recognition  |             |
| Records  |             |
| Dealing with Disclosures   |             |
| Referral   |             |
| Attendance at Case Conferences, core groups and CIN meetings   |             |
| Monitoring   |             |
| Confidentiality and Information Sharing  |             |
| Working with parents and carers  |             |
| Multi-agency working   |             |
| <b><u>Safeguarding Issues</u></b>  | <b>11</b>   |
| ○ Child-on-child abuse   |             |
| ○ Child on child sexual behaviour, sexual violence and harassment including consent  |             |
| ○ What to do if you are informed that a parent is on the sex offenders register  |             |
| ○ Non collection of children   |             |
| <b><u>Contextual (Extra-Familial) Safeguarding for Young People</u></b>  | <b>15</b>   |
| ○ Children who run away/go missing   |             |
| ○ Child Criminal Exploitation (CCE)  |             |
| ○ Children at risk of Sexual Exploitation (CSE)  |             |
| ○ Serious Violent Crime – people at risk from gang activity or serious youth violence  |             |
| ○ Domestic Abuse or Sexual Violence  |             |
| ○ Operation Encompass  |             |
| ○ Prevention of radicalisation and extremism   |             |
| ○ Mandatory reporting of Female genital mutilation (FGM) ( <i>including so-called Honour based abuse, breast ironing and forced marriage</i> ) |             |
| ○ Modern Slavery   |             |
| ○ Children requiring mental health support   |             |
| ○ Online safety  |             |
| ○ Remote Learning  |             |
| ○ Filtering and Monitoring   |             |
| ○ Reviewing Online Safety  |             |
| ○ Cybercrime   |             |
| ○ Looked after children and care leavers   |             |
| ○ Children who are lesbian, gay, bi - sexual, or transgender (LGBT)  |             |

- Children with SEND
- Private Fostering
- Young Carers
- Fabricated and induced Illness
- Homelessness
- Children with Family Members in Prison
- Children and the Court system
- Non-collection of children from school
- Missing from education
- Elective Home Education (EHE)
- Opportunities to teach Safeguarding
- The Child's Wishes
- Other relevant safeguarding guidance

**PART 2 Responsibility of Governors, Proprietors and Management 28**

Croydon's Children Families & Education Directorate  
 Governing Board  
 Schools and head teachers/principals

**PART 3 Safer recruitment 30**

General Principles  
 Checks to be carried out  
 Retention of Documents  
 Agency Staff  
 Volunteers  
 Trainee and student teachers  
 References  
 DBS checks  
 Alternative provision

**PART 4 Safeguarding concerns and Allegations against staff 42**

Conduct and Safe Teaching Practice  
 Allegations that meet Harms threshold  
 Concerns that do not meet Harms threshold – low level concerns  
 Whistleblowing  
 Providing Intimate or Personal care to pupils  
 Behaviour Management and use of reasonable force  
 Music Tuition

**PART 5 Health and safety/risk assessment 46**

Responsibility for Health and Safety  
 Risk Assessments  
 Working with aggressive and violent parents  
 Site Security and Visitors  
 Use of school premises by other organisations  
 Monitoring and review

**Annex 1: The role of the Designated Safeguarding Lead 49**

**Annex 2: Early years settings in schools 51**

**Annex 3: Child protection definitions and indicators 54**

**Annex 4: NHSG Child on Child abuse policy 55**

**Annex 5: Actions where there are concerns about a child 58**

**Annex 6: Schools Single Central Register/Record (SCR) 59**

**Annex 7: KAPS Our keeping Ourselves Safe Behaviour Code 61**

**Annex 8: KAPS Managing to Go Policy 65**

## Key contacts

### School/college

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**Designated safeguarding lead(s):**

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**Nominated governor for safeguarding:**

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### Local Authority Designated Officer (LADO):

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### MASH (Multi-Agency Safeguarding Hub):

For urgent child protection matters requiring immediate attention: Tel: 0208 255 2888 (9-5pm)

Professionals Consultation Line: Tel: 0208 726 6464 (1-4.30pm)

Out of Hours line: 020 8726 6400 (5pm-9am)

MASH Service Manager: Jonathan Lung  
Email: [Jonathan.Lung@croydon.gov.uk](mailto:Jonathan.Lung@croydon.gov.uk)

### Croydon Safeguarding Children Partnership (CSCP)

Website: [https://croydonlcsb.org.uk/Safeguarding learning & development](https://croydonlcsb.org.uk/Safeguarding%20learning%20&%20development)  
Email: [CSCP@croydon.gov.uk](mailto:CSCP@croydon.gov.uk)  
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## Core operational policies and procedures

### Purpose and Aims of this policy

This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England **must** have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18 (KCSIE 2023). KCSIE also applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021

It is essential that **everybody** working in a school or college understands their safeguarding responsibilities and that no single person or agency will hold the full picture for a child/family. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play.

### Aims

The trust aims to:

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with children including the completion of risk assessments.
- Ensure staff are appropriately trained.

- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns.
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that links with relevant agencies are effective including working in partnership regarding child protection matters, including attendance at case conferences and core group meetings.
- Ensure the school environment is safe and is one in which pupils feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure pupils know there are adults in the school who they can approach if they are worried about anything.
- Ensure the curriculum and other provision, including opportunities in the PSHE curriculum, develop and equip pupils with the skills needed to feel safe and adopt safe practices
- Support for pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure pupils are protected from all forms of harm.

## **PART 1 Safeguarding Information for ALL Staff**

### **Induction and training**

- The Headteacher will ensure that all staff are fully inducted, are made aware of the following policies of the school and that staff are fully aware of their role in implementing these:
  - All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
  - Safeguarding and child protection policy and procedures (including information themes such as Child-on-Child abuse, contextual safeguarding, and Online Safety)
  - Behaviour policy (including measures to prevent bullying including cyberbullying, prejudiced based and discriminatory bullying.)
  - Staff code of conduct including low-level concerns, allegations against staff and whistleblowing. It should also include acceptable use of technology including mobile phones and pupil/staff relationships and communication including social media.
  - Safeguarding response to children who are absent from education, especially for long periods.
  - Role of the designated safeguarding lead and deputies
- Staff Including those not directly working with children, will be asked to confirm that they have received, read, and understood all relevant staff policies, including “*What to do if you are worried a child is being abused*” guidance and ‘*Keeping Children Safe in Education 2023 part 1*’.
- The designated safeguarding lead (DSL) will ensure that all staff are fully inducted with regard to the school/college child protection procedures and that they receive safeguarding and child protection training on a two yearly basis as a minimum. This will include online safety.
- The head teacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- School/college staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
- As well as basic safeguarding training, the designated safeguarding lead and their deputies will receive specific training on their role on their role and other relevant multi-agency training courses.
- Schools/college staff will also receive training on Early Help and the MASH safeguarding referral process as part of their safeguarding training. They will understand what the services are for and how to

access support through them. This will include also understand the difference between Section 17 (child in need) and Section 47 (suffering or likely to suffer significant harm).

- School/college staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation (for example, via email, e-bulletins, and staff meetings).
- **All staff** should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All staff** should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.
- **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

## **Safeguarding children**

### **Safeguarding: is about every child**

In relation to children and young people, safeguarding and promoting their welfare is defined in 'Working together to safeguard children' as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- and taking action to enable all children to have the best outcomes.

### **Early help cases**

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- children with disabilities and additional needs, including those with special educational needs (whether they have an EHCP or not)
- young carers
- if the child has a mental health need.
- children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime.
- children who frequently go missing from home, school or care.
- children who are misusing drugs or alcohol.
- children at risk of exploitation through modern day slavery and trafficking.
- Children at risk of being radicalised or exploited.
- A family member in prison or is affected by parental offending.
- children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse.
- Misusing drugs or alcohol themselves.
- children who have returned home from care.
- children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low-level neglect.
- is at risk of honour-based abuse such as Female Genital Mutilation (FGM) or forced marriage.
- is persistently absent from education.
- privately fostered children.
- Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the school/college.

- If the child requires an early help service from another agency, the school/college will make a referral to the Multi Agency Safeguarding Hub (MASH) for appropriate help and support. Staff will consult with parents *prior* to making any referral to discuss the matter and **gain consent** to refer the child.
- Where the child is receiving an Early Help service, the school/college will work as part of the Team Around the Child/Family (TAC/F) and take up the role of lead professional where this is appropriate.
- Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school/college believes that this is not the case, consideration should be given making a referral for a statutory social work service.

**Child Protection: is those at risk of significant harm.**

The school/college will carry out its duty to safeguard pupils which is:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care,
- and undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.

***For a list of definitions and indicators of abuse and neglect, see appendix 1.***

***The Croydon Safeguarding Partnership threshold document can be found at [CSCP Threshold Guidance \(croydonlcsb.org.uk\)](https://www.croydonlcsb.org.uk)***

Action may be needed to protect children and learners from specific safeguarding issues such as:

- Abuse: Neglect, physical, sexual and emotional (see KCSIE 2023, pages 9-11)
- Disguised compliance
- Children missing in Education (CME)
- Children who are home schooled ('Hidden Children')
- Radicalisation / extremism
- So-called 'Honour' Based Abuse (HBA)
- Breast Ironing
- Mental health concerns including self-harm
- Bullying including on-line (cyber) bullying and prejudice-based bullying
- Racism, disability, homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Domestic Abuse
- Poor parenting
- Child sexual exploitation and trafficking (CSE)
- The impact of new technologies on sexual behaviour
- Substance misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Fabricated or induced illness
- Faith abuse
- Gangs and serious violence (including Child Criminal Exploitation: County Lines)
- Private fostering
- Sexting (Youth Produced Sexual Imagery)
- Child-on-child abuse
- Teenage relationship abuse
- Serious Violent Crime
- Sexual violence
- Sexual harassment
- Children with family members in prison
- Children and the court system
- Homelessness



- Adverse Childhood Experiences (ACEs)
- Trauma and Attachment issues
- Up-skirting
- Knife Crime
- County Lines
- Modern Day Slavery
- Cybercrime

The school/college will seek advice from the MASH Professionals' Consultation Line to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

The MASH Professionals' Consultation Number is 0208 726 6464 (1-4.30pm, Monday to Friday).

All referrals for a children's social care service or Early Help will be made by way of the MASH Portal.

#### [MASH Referral](#)

Parental consent for referral will be sought *unless* there are concerns this may put the CYP at risk of additional harm or advised not to by a member of the MASH team. This links to specific areas such as allegations of sexual abuse, concerns of fabricated or induced illness or the parent is the alleged perpetrator, in which case a referral should be made regardless.

Staff will also share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs.

The Online tool [Report a child to your local council](#) directs you to the local children's social care contact number.

#### **Referral for a statutory social work service**

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputies are most likely to have the most complete safeguarding overview. Following consultation, the designated safeguarding lead should decide on whether to make a referral to children's social care via MASH. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools give as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual (extra familial) approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Croydon's MASH team manager to triage and allocated to a social worker to gather relevant information from other agencies.

MASH will inform the school/college of the outcome of any referral they make and what action children's social care will be taking. This may include any of the following:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting/discussion under child protection** procedures as set out in section 4 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.
- Providing interim services for the child and their family in the meantime whilst work is on-going (including details of appropriate services).
- Families may also be referred to Early help or signposted to universal services.

#### **Children who need a Social Worker**

Children may have a social worker due to neglect, abuse or difficult family circumstances. Their experience can leave them vulnerable to further harm and we have a duty as professionals to help protect them. The local authority should communicate with the designated lead so they know if a child has a social worker and therefore enable them to make decisions which are in the best interest of the child's safety, welfare and educational outcomes.

Further documents which may assist in supporting these families can be found in [Review of children in need. Help, Protection, Education](#) concludes the review.

## **Child protection procedures**

### **Role of school/college**

The school will work to the following policy documents in order to support the protection of pupils who are at risk of significant harm.

Working together to safeguard children (*DfE 2018*)

- [Working together to safeguard children](#)

What to do if you're worried a child is being abused (*DfE2015*)

- [What to do if you're worried a child is being abused - Publications - GOV.UK](#)

The London Safeguarding Children Board child protection procedures

- [London Safeguarding Children Board: Child Protection Procedures](#)

Keeping children safe in education (DFE 2023)

- [Keeping Children Safe in Education](#)

Croydon Safeguarding Board local policies and procedures

- [CSCB local policies and procedures](#)

London Child Protection Procedures 2022

- [London Procedures](#)

*Other document links can be found within their relevant sections of this policy.*

In line with these policies and procedures, the school/college will:

- identify those pupils where there are child protection concerns and make a referral to MASH
- attend child protection case conferences in order to effectively share information about risk and harm
- contribute to the development and monitoring of child protection plans as a member of the core group
- carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing, and liaising with the allocated social worker as required.

### **Recognition**

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- **Staff should refer to Annex 3 for abuse indicators** or page 12 onwards of KCSIE, that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputies and advice sought on what action should be taken. Where required, advice can be obtained from the Professionals Consultation Line on a no-names basis.
- Concerns may be monitored over time and all concerns should be recorded on CPOMS
- All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- **All staff** should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.

### **Records**

- All safeguarding monitoring records and Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the school.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on CPOMS and all records should be signed and dated.
- Records should show:
  - Concern – What the concerns were
  - Action – What steps have been taken e.g. had check in conversation taken place, have parents been contacted.
  - Outcome – What follow up action will be taken
- Outcomes
  - Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken and outcomes.
  - A CPOMS log must be completed.
    - whenever concerns arise or there is a serious incident **or**
    - where a child is being monitored, prior to a case conference or core group meeting.
  - When a child who transitions to a new educational provision, the master file is passed to the designated safeguarding lead at the new school, transferred securely and confirmation of receipt obtained. Designated Leads should also consider if there is a need to share any key information about the family ahead of their start date. This may assist the new school in planning appropriate support for the family.
  - A copy of child protection & safeguarding file should be retained by the school and kept in line with the school's information retention schedule. Child protection & safeguarding records must be disposed of as confidential waste.

### **Dealing with disclosures**

If a pupil discloses to a member of staff that they are being abused, the member of staff should.

- listen to what is said without displaying shock or disbelief and accept what the child is saying.
- allow the child to talk freely.
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to children's social care.
- reassure the child that what has happened is not their fault and that they were right to tell someone.
- not ask direct questions but allow the child to tell their story.
- not criticise the alleged perpetrator.
- explain what will happen next and who has to be told.
- make a formal record and pass this on to the designated safeguarding lead.

### **DO NOT DELAY**

- Tell the Designated Safeguarding Lead as soon as you can by adding the incident to CPOMS – it may be necessary to interrupt a lesson to do this – at NHSG staff should use the walkabout duty for urgent cover to allow them to speak with the DSL team as soon as possible. Early referral gives more time to offer help to the pupil and family before the situation becomes more serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult MASH.

## **Referral**

- Where possible, a decision on whether or not to refer a pupil to MASH should be made by the designated safeguarding lead or their deputies following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and *any* member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior leadership team and take advice from the MASH team social worker. The designated safeguarding lead should be informed as soon as possible.
- Referrals should be completed using the MASH safeguarding portal by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the MASH safeguarding portal within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with the MASH Professionals’ Consultation Line to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- If the child already has an allocated social worker, the referral should be made directly to them. If the child is not already known to children’s social care, referrals should be made to MASH. If the child lives outside Croydon, a referral should be made to their home local authority.
- All referrals will be acknowledged by the MASH and the referrer informed of what action will be taken.
- If the school/college does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with children’s social care via the designated safeguarding lead.

## **Attendance at Case Conferences, Core Groups and Child in Need Meetings**

- The designated safeguarding lead will liaise with children’s social care to ensure that all relevant information held by the school/college is provided to children’s social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that the school is represented at child protection case conferences and core group meetings:
  - where possible, a member of staff who knows the child best, such as a of head of year will be nominated to attend
  - failing that, the designated safeguarding lead or their deputy will attend.
  - if no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

## **Monitoring**

Where a pupil is the subject of a child protection plan, and the school has been asked to monitor their attendance and welfare as part of this plan.

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead.
- all information will be recorded on CPOMs prior to each conference and core group meeting. Copies of CPOMs records will be made available for all conferences and core group meetings.
- the designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

## **Confidentiality and Information Sharing**

**KCSIE 2023 tells us that**

**The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

Further information on information sharing can be found:

- [Chapter 1 – Working Together to safeguard children](#)
  - [Information Sharing: Advice for Practitioners](#)
  - [Information Commissioner’s Office](#)
  - [Data Protection Toolkit for Schools](#)
- All information obtained by school staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family’s consent.
  - If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act. Otherwise consent should be sought from parents.
  - Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with children’s social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by children’s social care.
  - Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this. Before taking this step, schools and colleges should consider the proportionality of disclosure against non-disclosure. *is the duty of confidentiality overridden by the need to safeguard the child?*
  - Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the MASH Professionals Consultation Line on a “no names” basis to gain advice on whether this course of action should be taken.
  - Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.
  - In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school duty to share information.
  - Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the MASH Professionals Consultation Line.

### **Working with Parents and Carers**

The school recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

The school will:

- make parents aware of the school statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by making all school policies available on the school’s website.
- provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff.
- consult with and involve parents and carers in the development of school policies to ensure their views are taken into account.
- ensure a robust complaints system is in place to deal with issues raised by parents and carers.

- provide advice and signpost parents and carers to other services and resources where pupils need extra support.
- Schools should also be aware of the additional guidance available from the DfE on dealing with issues around parental responsibility: [Understanding and dealing with issues relating to parental responsibility](#)

### **Multi-agency Working**

- The school will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and *Working together to safeguard children* 2018.
- The school recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

### **Inspection**

- Since September 2019 since Ofsted's Inspection of schools, early years and Post-16, inspectors will judge whether establishments are effective in their provision of safeguarding. [Ofsted Education Inspection Framework](#). Additional guidance for Early Years is available [here](#).

- **Safeguarding Issues**

**The Law – KCSIE 2023 Page 24 sets out legal requirements around safeguarding. These include**

[The Human Rights Act 1998](#)

[Equality Act 2010](#)

[Equality and Human Rights Commission](#)

### **Child-on-Child abuse**

Child-on-child abuse is where a pupil's behaviour is likely to cause significant harm to other pupils.

This is most likely to include, but not limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment.
- gender-based violence.
- sexting (also known as youth produced sexual imagery).
- initiation/hazing type violence and rituals.
- upskirting (typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019)

This type of abuse should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The school will refer the perpetrator and the victim to children's social care via MASH.

### **Child on child sexual behaviour, sexual violence and harassment**

Schools (including 6<sup>th</sup> forms) should 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 college premises, and or online (what to look out for, and indicators of abuse are set out in Part one KCSIE 2023).

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to college age. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of 'it could happen here' and know we have **ZERO-Tolerance to child-on-child harassment, abuse and violence.**

Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable.

### **Sexual Violence**

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent are crimes. (*Definitions of categories can be found on page 104 KCSIE 2023*). Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same. The designated safeguarding lead (or deputies) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

### **Consent**

KCSIE tells us that *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.*

### **The following situations are statutorily clear and do not allow for contrary decisions:**

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Further information on consent can be found [HERE](#).

### **Sexual Harassment**

KCSIE 2023 tells us that *when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.*

Examples include:

- sexual comments
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes.
- displaying pictures, photos or drawings of a sexual nature
- upskirting and
- online sexual harassment. Further examples can be found on page 106 KCSIE 2023.

### **Harmful Sexual Behaviour**

This is where sexual behaviour ranges from developmentally 'normal' to inappropriate, problematic, abusive and violent. Harmful Sexual Behaviour HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in KCSIE 2023 Page 107

### **Policy**

- Schools recognise that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. School behaviour management and anti-

bullying policies will reflect the school approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

- The school will follow the guidance within Part 5 of *KCSIE* as part of the school safeguarding procedures, and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.
- The school will take all necessary steps to put in place a planned PHSE curriculum to convey the school policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct. The school will also make close links to the new [Relationships Education Curriculum](#) which is compulsory for all schools from September 2020.
- The school will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school and appropriate referrals made to the police and children's social care.
- The school will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff.
- It should be noted that **ALL** reports of sexual harassment and violence should be taken seriously, but staff need to be aware 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. Children with additional needs are three times more likely to be abused.
- The school will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

### Procedures

- Not all children will directly tell a member of staff about their experience and staff need to know how to respond when overhearing a conversation or if they notice a change in the child's behaviour. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing.
- The school will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the *Keeping children safe in education* statutory guidance.
- Governing bodies and proprietors should ensure that the schools contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the school environment. Toolkits that will support the risk assessment process include: [Brook: traffic light tool](#).
- Where the allegation involves material posted online, the school will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance [Searching, screening and confiscation guidance](#) and [UKCIS Sexting in schools and colleges advice](#).
- 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 and informing the designated safeguarding lead (or deputies), as soon as practically possible, if the designated safeguarding lead (or deputies) are not involved in the initial report.
- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support, 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.
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the school will respond to the incident.



- The designated safeguarding lead may take advice from MASH Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police, or managing the matter internally under school behaviour policies.
- Where a referral will be made to children social care or the police, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.
- KCSIE states that Schools should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputies) are likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed. 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 and consideration of harmful sexual behaviour. the ages of the children involved. the developmental stages of the children involved. any power imbalance between the children. 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, adult students or school or college staff. and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and children's social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, the school will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.
- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will "take sides" following a report and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- [The National Organisation for the Treatment of Abusers \(NOTA\)](#) provides support for professionals involved in work with, or related to, sexual offending.
- School will consult with **Part 5 KCSIE 2023** (*specifically pages 110-115*) when managing allegations of child-on-child sexual harassment or sexual violence. Schools will consider the 4 likely scenarios when managing reports of incidents  
 Manage internally  
 Early Help  
 Referral to Children's social Care  
 Report to Police
- Risk assessing (480), safeguarding and supporting victims (551), Safeguarding and supporting the alleged perpetrator (540), disciplining alleged perpetrators (544) and safeguarding other children (553), can all be advised through the relevant paragraphs in KCSIE 2023.
- School will refer to paragraphs 527-530 with regards to unsubstantiated, unfounded, false or malicious reports and fully follow the recommendations/guidance of recording information and what to do when the report is found to be unsubstantiated, unfounded, false or malicious.

### **What to do if you are informed that a parent is on the sex offenders register**

In this situation the head teacher will be guided by parole conditions where relevant to keep children safe in school. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

**Additional procedures – NSHG’s Child on Child abuse policy can be found in Annex 4  
KAPS Our Keeping Ourselves Safe Behaviour Code can be found in annexe 7**

### **Contextual (Extra Familial) safeguarding for young people.**

The school is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at school or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. School safeguarding policies must therefore reflect the needs of young people in their own communities. (Please see the school’s annex to this policy).

Schools act as a protective factor in children’s lives. Children who do not attend can become *hidden*, which means that schools are less able to help and protect them. Children who do not attend school may be at further risk of not achieving their educational potential. This could include the following groups:

- Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.
- Children who fall under the heading ‘educated at home’, but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
- Children attending unregistered schools, sometimes under the guise of being electively home educated.
- Children in alternative provision that is of insufficient quality or is not provided for the required hours.
- Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

### **Children who run away/go missing**

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If a school becomes aware of a child who is missing from home or care and that child has not been reported missing to the police they should do so using 101.

Running away may be an indicator of other problems and therefore referral to MASH should be considered. Early intervention after the first episode may prevent a child being exploited.

[Children who run away or go missing from home or care](#)

### **Child criminal exploitation – county lines**

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, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over 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 and young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources. If you become aware of child or young person who may be at risk a referral should be made to MASH.

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

**KCSIE 2023 states:** All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### **Children at risk of Sexual Exploitation (CSE)**

Both Child Criminal Exploitation and Child sexual exploitation is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 in sexual or criminal activity a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with male or female, adults or children and can be a one-off event or a series. Criminal and sexual exploitation of females can present differently in girls to boys as well as potential indicators.

#### **The three main types of child sexual exploitation:**

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. It can also occur through the use of technology.

#### **Inappropriate relationships**

- Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

#### **Boyfriend/Girlfriend**

- Abuser grooms a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

#### **Organised exploitation and trafficking**

- Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

#### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Suspension, exclusion, or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours. and
- Self-harm or significant changes in emotional well-being.

#### **Potential vulnerabilities**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

If a school becomes aware of child that may be being sexual exploited they should refer to MASH.

[Child sexual exploitation – DfE guidance](#)

### **Serious Violent Crime - people at risk from gang activity or serious youth violence**

Schools are a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities.

Staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These may indicate involvement or approach by criminal networks or gangs.

Schools need to be alert to the possibility of children and young people bringing weapons onto their site.

There are various reasons why a young person may be carrying a weapon. These should be explored with the young person.

Under Croydon's weapons in schools protocol the police must be informed via 101 of any pupil found in possession of a weapon in school or any weapon that is found on the school site.

[Preventing youth violence and gang involvement](#)

### **Domestic abuse and/or sexual violence**

Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act 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).

### **Operation Encompass**

Croydon is part of the Operation Encompass service which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school 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 police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. (KCSIE 2023)

**National Domestic Abuse Helpline** - Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Schools should refer young people who are victims of domestic or sexual violence to MASH.

Further advice and guidance can be obtained from the Family Justice Centre who can be contacted by phoning their helpline of 0208 688 0100 or by emailing [fjc@croydon.gov.uk](mailto:fjc@croydon.gov.uk)

**Additional advice** on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects • Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Specific guidance on adolescent to parent violence and abuse is published by the Home Office

[Adolescent to parent violence and abuse \(APVA\)](#)

## **Prevention of Radicalisation and Extremism**

The schools safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

[Promoting fundamental British values as part of SMSC in schools](#)

Under Counter-Terrorism and Security Act 2015, the school also has a duty to refer young people on to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

[The Prevent Duty](#)

Where a school has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation, the school should make a referral to MASH using the MASH Safeguarding referral portal.

## **Risk indicators of vulnerable pupils**

**Indicators of an identity crisis include the following:**

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

**Indicators of a personal crisis include the following:**

- Family tensions
- A sense of isolation

- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

**Indicators of vulnerability through personal circumstances include the following:**

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

**Indicators of vulnerability through unmet aspirations include the following:**

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality
- Experiences of dealing with the police
- Involvement with criminal groups

**Critical indicators include where the pupil is:**

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

**When making a judgement, staff may consider the following questions:**

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities?
- Has the pupil witnessed or become the victim of racial or religious hate crimes?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Is there a pattern of regular or extended travel within the UK?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?
- Is the pupil the victim of social isolation?

**Educate Against Hate**, a website launched by Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British Values) to help recognise and address extremism and radicalisation in young people.

**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.

*Schools should always be a safe space for young people to explore new ideas and perspectives, and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered the school should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.*

*The school designated safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools*

## **Mandatory reporting of Female Genital Mutilation (FGM)**

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK. FGM typically takes place between birth and around 15 years old. however, it is believed that the majority of cases happen between the ages of five and eight.

### **Risk factors for FGM include:**

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

### **Indications that FGM may have already taken place may include:**

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The school will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM:

[Multi-agency statutory guidance on female genital mutilation](#)

Where a pupil makes a disclosure of FGM, the school/college will follow the mandatory reporting rules and make appropriate referrals to the police and MASH using the MASH Safeguarding Referral portal.

**So-called '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** (mentioned above), forced marriage, and practices such as breast ironing.

**Breast Ironing** is practiced in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

**Forced Marriage** If a school becomes aware of a child that may be at risk of a **forced marriage** they should in the first instance make a referral in to MASH. If a child is at immediate risk, they should contact the police.

Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit by phone 0207 008 0151 or emailing [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)

### [Forced marriage - FCO Guidance](#)

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

## **Modern Day 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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

## **Children Requiring Mental Health Support**

Schools play a key role in supporting the emotional health and well-being of pupils. In some cases, mental health can be an indicator of abuse and all provisions should have clear procedures on how to access the appropriate support for these children. More information can be found in the [mental health and behaviour in schools guidance](#).

Children who have experienced abuse and Adverse Childhood Experience (ACEs) through traumatic events are likely to be impacted. Only appropriately trained professionals should make diagnosis. The Additional documents listed below may also assist in supporting children and young people. See [Rise Above](#) for links to all materials and lesson plans.

Guidance and policies relating to a range of topics can be found on the [CSCB website](#).

## **Online Safety**

As part of their duty to provide a safe learning environment and schools should ensure their pupils know how to remain safe online.

There is considerable risk to children online, but they can be categorised within these four areas as stated within KCSIE:

### **content:**

- being exposed to illegal, inappropriate or harmful content. for example: pornography, fake news, racist, misogynistic, self-harm, suicide, anti-Semitic, radical and extremist.

### **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 for the purposes of grooming children. and

### **conduct:**

- personal online behaviour that increases the likelihood of, or causes, harm. for example, making, sending and receiving explicit images, sharing others explicit images and online bullying.

### **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/>).

The DfE published [Teaching Online Safety in Schools](#) identifying the importance of including reporting and acting on online safety concerns within the Child Protection Policy, school behaviour policy and bullying policy.

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system.



Pupils should be just as clear about what is expected of them online as offline. A recommended framework published by UK Council for Child Internet Safety (UKCCIS) supports the delivery of online safety.

[Educated for a Connected World](#).

The school is aware that some pupils may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, children's social care or other agencies in order to overcome problems or keep them safe.

Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are.

[Be internet legends](#)

[Disrespect Nobody](#)

[PSHE Association](#)

[ThinkUKnow](#)

[Safer Internet centre](#)

[360 Safe Website](#) has a free online self-assessment tool for schools.

## Remote Learning

Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC and PSHE Association also provide helpful advice:

NSPCC Learning - Undertaking remote teaching safely during school closures

PSHE - PSHE Association coronavirus hub Filters and monitoring

## Filtering and Monitoring

KCSIE states that *whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs safeguarding risks.*

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

Schools and colleges will adhere to the DfE [Filtering and Monitoring Standards](#) in order to fulfil their duties.

The school will

- identify and assign roles and responsibilities to manage filtering and monitoring.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

Further guidance on filtering and monitoring can be found at: UK Safer Internet Centre: "appropriate" filtering and monitoring.

<https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>. Southwest Grid for Learning ([swgfl.org.uk](http://swgfl.org.uk)) have created a [tool](#) to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

## Reviewing Online Safety

Due to ever evolving technology and associated risks, schools and colleges should be aware of the rapid changes and have regular reviews such as an annual review of their approach to online

safety. This should be supported by an annual risk assessment which reflects current risks children face online.

KCSIE provide the following advice which schools can refer to.

*UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.*

## **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'. Attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources. and,
  - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (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. Additional advice can be found at: [Cyber Choices](#), 'NPCC- When to call the Police' and National Cyber Security Centre - [NCSC.GOV.UK](#)

## **Looked after and Previously Looked After Children and Care Leavers**

The school recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The schools designated teacher for CLA and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, the designated safeguarding lead will consult with the designated teacher to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

The Virtual School Head is the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of a local authority's looked-after children, including those placed out-of-authority. More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked After Children](#).

## **Children who are lesbian, gay, bi, or trans (LGBT)**

Children being LGBT is not a safeguarding concern in itself, but it is important to be aware that they can be targeted by others. This can increase the vulnerability of these children. It is important to consider helping LGBT children to identify a trusted adult who they can talk to as well as provide safe places within school to talk about their concerns.

LGBT inclusion is part of [Relationships Education and Relationships and Sex Education curriculum](#). There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

## **Children with Special Education Needs and Disabilities (SEND)**

The school is aware that children with special education needs may face increased risk of harm and abuse and may be more likely to experience bullying.

They can face additional safeguarding challenges because.

- there may be 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 can be disproportionately impacted by things like bullying without outwardly showing any signs.
- difficulties may arise in overcoming communication barriers.
- there may be a higher risk of peer group isolation

School/college policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. Schools/colleges should identify pupils who might need more support to be kept safe or to keep themselves safe. Further information can be found in the department's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

The Croydon Special Educational Needs and Disabilities Information and Support Services ([SENDIASS](#)). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.

### **Privately Fostered Children**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative' for 28 days or more. Examples of close relatives are aunts, uncles, grandparents. Those who are not 'close relatives' include cousins, great-aunts, neighbours. Schools have a legal duty to notify Croydon of any pupils they know to be private fostered. Designated safeguarding leads should refer to MASH any private fostering arrangements that come to their notice.

### **Why are children in Private Foster Care?**

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents have moved away, but the child stays behind (e.g. to stay at the same school to finish exams)
- teenagers living separately from their own family
- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families

### **Are children in private foster care defined as 'Local after Children'?**

No. The term 'Looked after Children' means children who are looked after by the local authority. Privately fostered children are outside the care of the local authority. Schools should not therefore code children in private foster care as 'LAC'.

### **Children staying with host families (homestay)**

Some schools and colleges make arrangements for their pupils to have learning experiences by staying with a 'host family' who are not related. It can be part of a foreign exchange visit and known as 'homestay' arrangements. Appendix E of KCSIE 2020 has further definition around this. In some cases where the family is within the UK, this could amount to private fostering under the Children's Act 1989 (see above).

### **Young Carers**

If schools have concerns about a pupil they believe to be a young carer, they can contact the Young Carers Service on 0208 649 9339.

Further details can be found on their website – [www.talkofftherecord.org](http://www.talkofftherecord.org)

### **Fabricated or Induced Illness**

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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 evicted from a property. 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.

### **Children with family members in prison**

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

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed and there are two [age appropriate guides](#) to support children. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Non-collection of children from school**

#### ***This section applies to Kensington Avenue Primary School only***

The school will put in place a policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide the details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected.

Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual.

In the event that anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave but contact the parent immediately.

If a child is uncollected at the end of the school day, the school will follow the procedure agreed with children's social care:

- The schools will check with the child to see if there are any changes to arrangements for collection and try to make contact with the parent or other family members, and wait with the child until someone comes to collect them.
- Children will not be released into the care of another parent even where they offer to take the child home.

- The school will contact the MASH Professionals' Consultation Line to seek advice at 4.00pm if there are difficulties in contacting parents or other family members.
- If all possible means of contact have been exhausted and no contact can be made with the parent by 4.30pm, the school will contact MASH and if advised to do so the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social services office.
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so.
- Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead. If there are also child protection concerns, a referral should be made to children's social care via MASH.

## **Children who are absent from education**

Schools need to be aware of those children who are absent from school for prolonged periods or/and on repeated occasions as this may be an indicator of welfare concerns.

Multi-agency working is essential when children are absent from school and potentially at greater risk of harm. This includes liaising with social workers where a child is on a child in need or child protection plan or is looked after by the local authority. P45 of KCSIE provides the following recommendations

Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.
- further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
- general information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.

## **Elective Home Education (EHE)**

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

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, we recommend that LAs, schools, and other key professionals 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.

DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

## **Opportunities to Teach Safeguarding**

The Governing body should ensure the school provide opportunities for children to learn about Safeguarding. General issues may be addressed through the broad and balance curriculum already in the school but key issues relevant to the school community and sensitive issues may be taught through

Relationships Education (all Primary pupils) and Relationships and Sex Education (all secondary pupils) and health Education (for all pupils in state funded schools) which is compulsory from September 2020. Schools are able to be flexible on how they teach this. DfE documents can be found [here](#).

The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#).

This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help schools and colleges understand and teach about safeguarding:

DfE advice for schools: teaching online safety in schools.

UK Council for Internet Safety (UKCIS) guidance: Education for a connected world.

UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people.

The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors.

National Crime Agency's CEOP education programme: Thinkuknow.

KCSIE 2023

## **A Child Centred Approach**

The best interest of the child should always be at the heart of any decision-making process around safeguarding. The Governing Body and school leaders should always make sure the child's wishes and feelings are taken into account when decisions for support are made, and actions taken.

## **Other relevant safeguarding guidance**

*Schools can access additional guidance, policies and procedures at:*

[CSCB local policies and procedures](#)

[CSCB Safeguarding in Education Toolkit](#)

[DfE Alternative Provision guidance](#)

[DfE School Attendance guidance](#)

[DfE School Attendance Parental Responsibility Measures guidance](#)

[DfE Behaviour in Schools guidance](#)

[DfE Preventing and Tackling Bullying guidance](#)

[DfE Children Missing Education guidance](#)

[DfE Best Practice Advice for School Complaints Procedures](#)

[DfE and ACPO Drug Advice for School guidance](#)

[DfE Advice for Schools on Equality Act 2010](#)

[Behaviour and Exclusions](#)

[DfE Supporting pupils at school with medical conditions](#)

[DfE Guidance on First Aid for Schools](#)

[DfE Mental health and behaviour in schools](#)

[DfE Use of reasonable force guidance](#)

[DfE Promoting fundamental British values as part of SMSC in Schools](#)

[DfE The Prevent Duty – Advice for Schools](#)

[DfE Sexual violence and sexual harassment between children in schools and colleges](#)

[DfE Children who run away or go missing from home or care](#)

[Child sexual exploitation – DfE guidance](#)

[Preventing youth violence and gang involvement](#)

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

[Preventing and tackling Bullying](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, parents and carers](#)

[Domestic Abuse: Various information/Guidance](#)

[Faith Based Abuse](#)

[Relationship Abuse: disrespect nobody](#)

[Homelessness: how local authorities should exercise their functions](#)

## **PART 2 Responsibility of Governors, Proprietors and Management**

Legislation and the Law which Governing Bodies and proprietors adhere to, can be found on pages 23-26 KCSIE 2023.

### **Croydon's Children Families & Education Directorate**

The Directorate includes services that will support the school to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an early help service
- providing statutory social work services under the Children Act 1989/2004
- providing the school/college with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

### **Governing Board**

The term 'governors' and 'governing board' is used throughout to refer to whoever is responsible for fulfilling governance functions. This could be the governors of a maintained school, the trustees of a single or multi-academy trust, or the local governing board to the function in question has been delegated within a multi-academy trust.

The Governing Board will ensure that the school/college meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- The school has the following policies in place and that these are regularly monitored, reviewed and updated where necessary.
  - safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies
  - a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
  - a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- A member of staff is appointed as the Designated Manager to address allegations against school staff
- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.

- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school/college and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and pupils are aware of the schools safeguarding and child protection policies and procedures.
- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The school has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the Governing Board has undertaken accredited safer recruitment training.
- There is a nominated member of the Governing Board who is responsible for Safeguarding and holds school accountable of their statutory duties.
- All staff receive safeguarding and child protection training every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation. Free safeguarding training is available for all Croydon schools via the [Learning & Development section of the CSCB website](#).
- The school has procedures in place to deal with allegations made against other pupils.
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

### **Schools and Head Teachers**

The head teacher will ensure that the school meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the school/colleges' safeguarding and child protection policies, behaviour policies and their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and know how to make, or request appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and know how to make, or request appropriate referrals to children's social care.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Staff are encouraged to attend learning events and participate in audit activity provided by the Safeguarding Children Partnership as well as promote published learning from events and serious case reviews.
- A Designated manager is appointed to manage allegations against staff
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The school offers a safe environment for staff and pupils to learn.
- Safeguarding issues are brought to the attention of the governing body.



## **1. Introduction**

This policy has been introduced to provide a framework for the efficient and effective recruitment of all categories of staff at The Manor Trust.

The Trust values the contribution of all staff and recognises that the recruitment of appropriately skilled staff is key to the provision of a safe and successful teaching and learning environment in which pupils can thrive.

The Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Accordingly, this policy complies with the current DfE guidance document 'Keeping Children Safe in Education'.

## **2. Aims of the Policy**

- To ensure that newly recruited staff possess the most appropriate blend of qualifications, experience, knowledge, skills and abilities to meet the demands of the post and the needs of the school.
- To ensure a consistent and equitable approach to the appointment of all staff.
- To ensure that all relevant equal opportunities legislation is adhered to and that appointees are recruited without regard to gender, gender reassignment, sexual orientation, marital or civil partnership status, colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave.
- To ensure that the recruitment and selection process is accessible to all by giving appropriate regard to the needs of individuals with a disability, with provision of reasonable adjustments where necessary.
- To ensure that all recruitment practices are compliant with DfE safeguarding guidance, with clear links to child protection policies and procedures, thereby ensuring as far as possible that all staff are suitable to work with children and young people.
- To ensure the most cost-effective use is made of resources in the recruitment and selection process.

## **3. Responsibilities**

The Governing Bodies, with appropriate advice from the Headteachers, are responsible for determining the staffing complement of the school and for all appointments to the school staff.

The Headteacher and one or more governors will have delegated responsibility for the appointment of teachers and other staff to the leadership group.

Once the selection panel has been agreed, the lead person, in conjunction with the panel, will be responsible for drawing up the relevant documentation and planning the selection process.

The selection panel for any position will have responsibility for ensuring that a fair, equitable and non-discriminatory process is maintained throughout the recruitment and selection activities.

## **4. Safer Recruitment**

Matters relating to child protection, safeguarding and the promotion of the welfare of children will be central to the recruitment process, starting with the planning of recruitment needs through to the selection exercise and appointment itself. Particular measures to ensure safe recruitment practice, compliant with DfE advice, are identified throughout this policy. The selection panel have responsibility for ensuring the implementation of these measures. The safeguarding measures noted in this policy are neither exhaustive nor intended to obviate the need to refer to the most recent DfE guidance as necessary.

## **5. The Planning Process**

The Trust board in conjunction with the Headteachers and Local Governing Bodies, will review the staffing requirements of the school annually and assess the short and long term recruitment needs so that, as far as possible, a planned approach to resourcing the school can be taken.

Before the start of the recruitment process, there will be a review of the requirements of the specific role. Where a job description or person specification does not exist (e.g. for new posts) then these will be drawn up for agreement by the selection panel.

Job descriptions and person specifications for existing posts will also be reviewed to determine whether the roles and responsibilities of the post need to be revised and to update the necessary qualifications, knowledge, experience, skills or abilities required by the postholder.

The person specification will also be assessed to ensure that it does not unlawfully discriminate on the basis of gender, gender reassignment, sexual orientation, marital or civil partnership status, colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave.

### **Safeguarding Measures**

- A statement of the school's commitment to the safeguarding and promotion of the welfare of pupils will be included in both the job description and the person specification.
- The job description will clearly set out the extent of relationships and contact with pupils and the degree of responsibility for children and young people that the postholder will have.
- All person specifications will give consideration to the need for the postholder to be suitable to work with children and young people. Qualifications, experience, competencies and qualities needed for the role will be identified, along with an explanation of how they will be assessed during the selection process.
- All shortlisted applicants will be notified that any relevant issues arising from references will be taken up at interview.

## **6. Advertising**

### **6.1 All posts**

All teaching and non-teaching posts will be advertised internally within the school and in any relevant vacancy circular. Posts may additionally be advertised on appropriate internet jobs sites, social media and/or in national/local press.

In certain circumstances a post or promotion opportunity will be ring-fenced for current staff in the first instance. Any such ring-fencing will be done in a consistent and transparent manner.

Occasionally the decision may be taken not to advertise a post. This may occur, for example, when a similar post has recently been advertised and an appointment can be made from the subsequent interviewees, or because a temporary appointment needs to be made as soon as possible to ensure continuity within a post.

### **6.2 Leadership posts**

Headteacher and Deputy Headteacher posts will be advertised as the CEO and Local Governing Bodies consider most appropriate. As a general rule, such posts will, as a minimum, be advertised on a relevant internet jobs site and may additionally be advertised in a nationally printed publication.

Where the CEO, Headteachers and Governing Bodies have determined that there is good reason not to advertise a leadership post the decision-making process will be clearly documented.

### **Safeguarding Measures**

- All advertisements will include:
- a statement about the school's commitment to safeguarding and promoting the welfare of children and young people, making clear that safeguarding checks will be undertaken;
- information about the safeguarding responsibilities of the post (as per the job description and person specification); and

- whether the post is exempt from the Rehabilitation of Offenders Act 1974, subject to the filtering rules which 'protect' certain spent convictions and cautions from disclosure.
- Reference will also be made to the requirement for the successful applicant to undertake an enhanced-level check via the Disclosure & Barring Service (DBS).

## 7. The Application Process

For all posts, information packs will be sent, or made available electronically, to all interested parties. The information pack will generally consist of:

- a letter from the person leading the recruitment process;
- a job description and person specification;
- an application form, including an equality monitoring form, with details for completion;
- a copy of, or a link to, the school's:
  - equal opportunities policy statement;
  - child protection policy and practices;
  - policy on employment of ex-offenders;
- a statement of terms and conditions relating to the post (hours, salary etc);
- information about the recruitment process (interview dates etc);
- any other relevant information regarding the post and the school.

Applications received after the closing date will not normally be considered, unless the applicant has given prior notice of a late application and this has been agreed by the selection panel, or there has been a low response to the advertisement.

Applications made through means other than application forms will not be considered, unless a reasonable adjustment has been made to accommodate the needs of an applicant with a disability.

### Safeguarding Measures

- All applications must be made using the application form for the position to ensure receipt of all relevant personal data, education and employment history, qualifications, details of referees and a statement of personal qualities and experience. CVs will not be accepted.
- The application form will include a statement that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

## 8. The Selection Process

### 8.1 The selection panel

A selection panel of at least two people will be set up prior to the shortlisting process. The members of this panel will be comprised of a member of the Senior Leadership team plus any of the following, as appropriate to the post:

- Line manager for the post
- One or more Governors depending on the role
- The HR Officer
- Professional advisers where particular expertise or guidance is required.

Wherever possible, all those with responsibilities for recruitment, including panel members, will have been trained in and/or have relevant experience of recruitment and selection and interviewing, particularly safer recruitment practices.

Where a candidate is known personally to a member of the selection panel this fact should be declared before shortlisting takes place. It may then be necessary to change the selection panel to ensure that there is no conflict of interest and to ensure equal treatment of candidates.

### **Safeguarding Measures**

- At least one member of the panel will have completed appropriate safer recruitment training.
- Safer Recruitment training will be offered to all Senior and Extended Leaders

## **8.2 Shortlisting**

Prior to shortlisting, the equality monitoring forms will be removed from the applications. If an applicant has requested reasonable adjustments to a part of the shortlisting process to accommodate a disability, this will be notified to the chair of the selection panel.

Our shortlisting process will involve at least two people

The shortlisting process for interview will determine those applicants who best meet the criteria for the post as outlined in the person specification. Decision making will be based solely on the information available on the application forms.

We will consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

### **Safeguarding Measures**

- Incomplete applications will be rejected and may, at the discretion of the selection panel, be returned to the candidate for completion.
- Notes will be made of any anomalies, discrepancies or gaps in employment so that these can be considered as part of the shortlisting process. Reasons for gaps in employment, repeated career changes, moves from permanent to temporary or supply teaching will also be noted for exploration and verification.
- Shortlisted candidates will be asked to complete and sign a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information

## **8.3 References**

Where possible references will be requested for all shortlisted candidates (including, where appropriate, internal applicants) prior to interview. The school will comply with the requirements of the Equality Act 2010 by not asking questions about a candidate's health or disability as part of these references prior to a job offer being made (including information relating to levels of sickness absence). It will be for the selection panel to determine whether the referees given by applicants are suitable and appropriate. References from family members or friends will not be acceptable.

All references subsequently received will be held by the chair of the interview panel who will explore any areas of concern at interview. Once a preferred candidate has been chosen following

the interview process, the rest of the interview panel will be given access to the references of that person only, in order to confirm their decision.

### **Safeguarding Measures**

- Any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations).
- References will be sought and obtained directly from the referee. Open references or testimonials provided by the applicant will not be accepted e.g. to whom it may concern.
- References will seek relevant and objective information, including information to verify the applicant's suitability to work with children and young people.
- References will be verified and issues of concern will be raised further with the referee and taken up with the candidate during the interview.
- Where, in exceptional situations, references are not received prior to the interview, any concerns will be resolved satisfactorily prior to any unconditional offer of employment.
- Obtain verification of the candidates most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children, if the applicant has never worked with children, then ensure a reference from their current employer
- Ensure electronic references originate from a legitimate source
- Compare the application form with that in the reference and take up any inconsistencies with the candidate
- establish the reason for the candidate leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed

### **8.4 Other checks prior to interview**

Where a candidate is claiming specific qualifications or previous experience that is relevant to the job but is not verified by reference checks, these will be verified before interview so that any discrepancy can be explored at interview.

### **8.5 The interview and selection process**

Prior to the interview and selection process candidates will be given any relevant information, e.g. details of any selection methods that will be used. Candidates who have a disability or any other particular needs will be given the opportunity to highlight this prior to any selection activities taking place in order that reasonable adjustments may be made to the recruitment process if required.

Whilst an interview is always likely to be used as the primary feature of the selection process, the selection panel will consider whether any additional selection methods are required to supplement the interview. These may include presentations, teaching observation, interaction with pupils, in-tray exercises, psychometric, verbal or numerical tests, according to the requirements of the role. Any psychometric tests used will have been validated in relation to the job, be free of bias, and be administered and validated only by a suitably trained person.

Whichever methods are chosen, the panel will use these to assess the merits of each candidate against the person specification and explore their suitability to work with children and young people. The selection panel will ensure that all candidates are asked the same core questions at interview based on the list of essential criteria for the post, although supplementary questions may differ according to the candidates' answers and backgrounds.

As a Trust we are dedicated to creating and maintaining Equality and Diversity in our recruitment process and in our hiring of staff to join our community. As a result, interviewers are expected to ask questions which encourage our new recruits to be culturally competent members of staff.

Interviewers can be expected to answer questions which explore their experiences of and attitudes towards working in diverse teams. They will be expected to display a cultural awareness of our community and regard values such as inclusiveness and tolerance very highly.

Particular care will be taken to ensure that no questions or selection methods could be viewed as discriminatory.

### **Safeguarding Measures**

- Invitations for interview will require candidates to bring with them documentation to verify their ID, i.e. passport, driving licence, birth certificate, etc.
- Candidates will be instructed to bring with them to interview any relevant documentation that will confirm education and professional qualifications. Copies of all documents will be kept on file for successful candidates.
- In addition to assessing the candidate's suitability for the post, the panel will assess the candidate's attitude toward children and young people and his/her ability to support the school's safeguarding agenda and promote the welfare of children. Gaps in employment history and concerns or discrepancies in the application form and references will also be explored.

## **9. Job Offers to Successful Candidates**

### **9.1 Job offers**

Successful candidates will normally be offered the post verbally, followed by an offer letter as soon as possible afterwards. A written offer of appointment will include any terms upon which the offer is made conditional, e.g. satisfactory completion of an occupational health questionnaire, provision of appropriate documentation to verify entitlement to work in the UK and other relevant details.

### **9.2 Conditions of Appointment**

Any offer of employment at the school will be conditional upon:

- The receipt of at least two satisfactory references, if not already received;
- Verification of the appointee's identity, if not verified following interview;
- A satisfactory Enhanced DBS Check (including a check of the Children's Barred List). We will obtain the certificate before or as soon as practicable after appointment, including the DBS Update service. If the DBS check is not received prior to commencement of employment a Barred list check and risk assessment will be undertaken by the Headteacher and Chair of Governors defining safeguarding measures to be put in place;
- Verification of the appointee's physical and mental fitness to undertake the role;
- Verification of the appointee's right to work in the UK (including a photocopy of the original evidence provided which will be kept for the duration of the member of staffs employment and for 2 years afterwards);
- Verification of the appointee's qualifications, if not verified following interview.
- Where it is a requirement of the post the offer will also be conditional upon:
- Verification of professional status, e.g. QTS/QTLS status, successful completion of statutory induction etc;
- A completed declaration form to confirm the appointee is not restricted in the work they may perform under childcare disqualification regulations;
- That candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state. Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.
- Satisfactory completion of a probationary period.

If the successful candidate has lived or worked outside the UK, the offer of employment will also be conditional on such additional checks as the school deems appropriate:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

KAPS: As a primary school and early years setting children under 8 years old are on site and therefore an additional check is required to be carried out for all staff to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

If any of the following circumstances come to light during the vetting process the facts will be reported to the Disclosure and Barring Service (DBS) and/or the police, as appropriate:

- Candidates are found to be on the Children's Barred List, or the DBS check shows that the candidate has been disqualified from working with children;
- An applicant has provided false information in, or in support of, his/her application; or
- There are serious concerns about an applicant's suitability to work with children.

### **Safeguarding measures**

- All staff responsible for undertaking compliance checks will undertake Safer Recruitment training

## **10. Appointment and Promotion of Existing Staff**

The school values the contribution of all staff within the school community and seeks to retain key skills. The school will support as far as possible the continued professional development of all staff as they seek promotion to new opportunities both within the school and elsewhere. All members of staff are therefore encouraged to consider their suitability for any vacancy within the school. Where a member of staff applies for a vacant post they will be given equal consideration alongside external candidates, based on the essential criteria for the post.

## **11. Use of Fixed Term and Temporary Contracts**

Where it is determined that posts are only of a short-term nature, this will be clearly specified in the job description and on any advertising literature. Posts will only be advertised on a temporary

or fixed-term basis for genuine reasons. Most temporary or fixed-term contracts will come to a natural end. Where, however, a fixed duration contract expires and the need for the post remains for a further definite period, then the postholder will usually be given an extension to their fixed period contract.

Where the need for a temporary or fixed-term post becomes a permanent one, there will be no automatic entitlement for the temporary postholder to be offered the permanent contract. It will be for the Headteacher to consider the most appropriate recruitment process in the circumstances. This could include, for example, consideration of the original reason for the post initially being temporary, any subsequent changes to the needs of the school and the original recruitment process that was undertaken.

## **12. Use of Supply Staff, Volunteers and Contractors**

The school workforce is made up of a rich variety of professional and highly skilled and committed people, not all of whom are paid employees. The school values the diversity that this brings to its community as it strives to provide a safe environment and improve the standards of teaching and learning for all pupils. To ensure the continued high standards of contributions, we will:

With appropriate adjustment, adopt similar recruitment measures for contractors as for employees, and for volunteers as for paid staff. We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

KAPS: Appropriate checks to ensure that individuals working on site are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006 apply. Full details within condition of appointment section 9.2 paragraph 4.

### **Contractors**

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

### **Volunteers**

We will:

- Seek references if they will help assess a potential volunteer's suitability for a role.



- Seek references for volunteers who will be working with pupils in school on a regular basis.
- Seek a character reference from a 'person of good standing' who they have known for some time if they have not been working recently.
- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **13. Trainee/student teachers**

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

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

### **14. Employment of Migrant Workers**

The school will not employ, as a member of staff, any individual who cannot demonstrate that he/she has the right to work in the UK, regardless of the individual's colour or apparent race, nationality or ethnic origins. Any employee who has a restricted right to work in the UK will be required to provide ongoing evidence of that right during employment.

The Trust is licensed to sponsor migrant workers who require sponsorship in order to work in the UK under Home Office rules. The school complies with Home Office requirements in relation to the points-based system for employing migrant workers and will ensure, prior to appointment, that a worker who is subject to immigration control can be employed via the issuing of a valid visa under the terms of the licence. The school will also meet, as required, all necessary conditions relating to sponsorship.

### **15. DBS Checks Existing staff, Governors and members**

#### **Existing staff**

We will endeavour to renew DBS checks on existing staff every 5 years. Staff will be encouraged to join the DBS Update service.

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding](#)

[Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#);

or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Governors and members**

All trustees, local governors and members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

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

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK
- The chair of the board will have their DBS check countersigned by the secretary of state.
- All governors will also have the following checks:
  - Identity
  - Right to work in the UK
  - Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

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

### **Adults who supervise pupils on work experience**

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

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

### **Pupils staying with host families**

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

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

## **16. Monitoring**

The Governing Bodies are mindful of their commitment to best practice in recruitment and its obligations under both the Equality Act 2010, DfE safer recruitment and current KCSIE guidance

and will ensure regular monitoring of all recruitment activity. This will be undertaken with a view to improving future recruitment practices and thereby achieving the aims of this policy. The results of this monitoring and any recommended actions will be reported to the Governing Bodies on an annual basis.

#### **17. Data Protection**

Records relating to recruitment and selection activities will remain confidential and accessible only to those who require information either as part of the recruitment decision-making process or for the administration of the process (including monitoring activities for the purposes of this policy or equality policies). Records relating to successful candidates will be placed in personnel files. Records for unsuccessful candidates will be retained in a secure place for a period of six months, after which time they will be securely destroyed. Inappropriate access or disclosure of recruitment data constitutes a data breach and should be reported in accordance with the school's data protection policy. It may also constitute a disciplinary offence, which will be dealt with under the school's disciplinary procedure.

#### **18. Status of Policy and Review**

The content and operation of this policy is reviewed as and when deemed necessary by the Governing Body. The policy is discretionary and does not confer any contractual rights.

- The schools will record details of the section 128 checks undertaken for those in management positions.

## DBS Risk Assessment Checklist

Starting work prior to DBS Certificate being seen

This risk assessment should be completed when considering whether to allow a new member of staff to start work before a new DBS certificate has been seen by the school.

Name of Person .....

Role .....

Interview Date .....

Proposed Start Date.....

DBS Check application date.....

[The person must not start without an application being made]

Is the person in 'Regulated' Activity? Yes / No

Reason for starting without seeing a new DBS Check

- Continuity of the school's provision to pupils
- Other (please state).....

Known Information

Have all the following checks been satisfactorily completed?

- o Identity check (photographic) [Essential]
- o Verification of current address [Essential]
- o Barred list check (if legally appropriate) [Essential]
- o Prohibition check (for teachers) [Essential]
- o Overseas checks (where relevant)
- o Right to Work in the UK [Essential]
- o Confirmation of qualifications [Essential]
- o Two references [Essential]
- o Any other information (please state)

.....

Previous DBS Certificate If the person has a previous DBS, on what date was it issued?

.....

When was the person's last day at work in their previous school or college?.....

If the person's proposed start date and their last day at their previous school or college are less than three months apart, then a new Enhanced DBS check is not required in law, although most schools will instigate a new one. Therefore, given that there is sufficient other information, the person could be assessed to be of low risk.

### Decision

High Risk – Person should not be allowed to start without a new Enhanced DBS, as there has been a break in service of more than three months (or they do not have an Enhanced DBS certificate) and/or there is insufficient information about the person in the 'Known Information' list above.

Medium Risk – Person may start work and although there is sufficient other information listed above, because there is a gap in service of three months or more (or they do not have an Enhanced DBS certificate), the person must be supervised\* at all times and should not undertake 1:1 work, personal care activities or residential visits. (\* The unchecked person must always be 'within sight and hearing' of a person with an Enhanced DBS check).

Low Risk – Person may start work, without additional supervision, as they already hold an Enhanced DBS check and there is no break in service of three months or more and all other checks have been satisfactorily completed.

Authorisation Headteacher (Print Name) .....

Headteacher (Signature)..... Date .....

Chair of Governors (Print Name).....

Chair of Governors (Signature) ..... Date.....

## **PART 4 Safeguarding Concerns and Allegations Against a Member of Staff**

### **Conduct and safe teaching practice**

- The school expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- Procedures are in place for the two areas of allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as 'low-level concerns'.)
- The head teacher will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the school/college expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- Governors will have their own separate code of conduct. This is a responsibility of the governing board or trust.
- Staff will be expected to follow the school/colleges social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with pupils and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the school/college computer system.

In the event that an allegation is made against a member of staff or volunteer, the school will follow Croydon's procedures for managing allegations against a member of staff.

[The Management of Allegations against Staff who work with Children and Young People](#)

The Governing Board will appoint the head teacher as the school Designated Manager for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the head teacher. Allegations against the head teacher will be referred to the Chair of the Governing Board.

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

An allegation is any information which indicates that a member of staff/volunteer may have:

- ***Behaved in a way that has, or may have harmed a child***
- ***Possibly committed a criminal offence against/related to a child***
- ***Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children***
- ***Behaved or may have behaved in a way that indicates they may not be suitable to work with children***

The last point includes behaviour that may have happened outside of school or college making them unsuitable to work with children. Known as *Transferable Risk*. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

This applies to any child the member of staff/volunteer has contact within their personal, professional or community with police or children's social care. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the head teacher/principal. If the concerns are about the head teacher/principal, the Chair of the Governing Board should be contacted.

The head teacher will always consult the Local Authority Designated Officer (LADO) immediately the school is aware of an allegation.

Following consultation, the head teacher in agreement with the LADO will decide on appropriate action and consider:

- Further Inquiries
- immediate referral to the Police
- consideration of disciplinary proceedings
  
- consideration of a senior strategy meeting

*Looking after the welfare of the child* - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.

*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.

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupils/students may also be at risk. The procedures in "Safeguarding Children and Safer Recruitment in Education" (DfE, 2006 – Updated 2011), Working Together to Safeguard Children (July 2018) and Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools" (DfE 2011) will be followed in such cases.

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2023 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher's employer, including an agency, dismisses or 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). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

### **Concerns that do not meet the harm threshold - Low Level Concerns**

***All concerns regarding the conduct of staff working with children should be referred to the LADO to consider whether the threshold for LADO involvement is met.***

Following on from submissions made by the London LADO Regional Group to the London Safeguarding Partnership, the London procedures have been altered to reflect the need to consult with the LADO on Low Level concerns.

### **Allegations Against Staff and Volunteers, including supply staff**

Agencies are encouraged to ensure that they have a **code of conduct** in place which clearly includes references to behaviours/relationships between people in a position of trust and those for whom they are responsible that are over the age of 18; this includes the **need for “low level” concerns to be discussed with the LADO and for them to be recorded.**

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. These could include 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.

It is important to have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

### **Low level concerns**

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) can be raised are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults or their behaviour towards children, (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This should enable schools and colleges to identify concerning, problematic or inappropriate behaviour early. minimise the risk of abuse. and ensure that adults working in or on behalf of the school or college are clear about professional boundaries.

### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in *paragraph 355 KCSIE 2023*. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that isn't quite right. This may be that they are 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 by the LADO to be serious enough to consider a referral.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one KCSIE 2023), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Low level concerns should be shared as with any other concerns and recorded for future reference in order to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](https://www.farrer.co.uk/resources/developing-and-implementing-a-low-level-concerns-policy).

### **Organisations or Individuals using school premises**

Where school or college receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the school or college should follow safeguarding policies and procedures, including informing the LADO.

### **Whistleblowing**

The school fosters a culture of openness in line with the “Freedom to speak up” review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the school that may cause a risk to children.

The school/college recognises that there may be circumstances where staff and pupils feel unable to raise concerns or incidents of malpractice within the school/college environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools are failing to safeguard and promote the welfare of children.

Where it is not possible to raise concerns within the school, staff and volunteers may report concerns to the following.

- Croydon’s lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil.
- The following numbers can be used where there are issues regarding the school/college’s overall procedures around safeguarding
  - Croydon Council’s confidential whistle blowing email address – [schoolwhistleblowing@croydon.gov.uk](mailto:schoolwhistleblowing@croydon.gov.uk)
  - the Ofsted whistle-blowing line on **0300 123 3155**
  - the NSPCC whistleblowing advice line on **0800 028 0285** is open from 8 am – 8pm Monday –Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

The head teacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

- The CSBC has an [escalation policy](#) which can be used by staff in school settings

### **Providing Intimate or Personal Care to Pupils – In KAPS we have our Managing To Go Policy which can be found in annexe 8**

#### **Behaviour management, physical intervention and reasonable force**

The school will put in place a behaviour management policy, which has been agreed by the Governing Board, which follows government guidance, and any use of physical intervention and restraint will be linked to the implementation of this policy.

There are occasions where it may be appropriate for staff in schools and colleges to use reasonable force in order to safeguard students. The term ‘reasonable force’ is used to define an action where staff will need to intervene in order to prevent injury or violence. Guidance for schools and colleges can be found [here](#). It is believed by the department that a ‘no-contact’ policy leaves staff at risk of being unable to fully safeguard pupils in extreme circumstances.

Physically handling children with SEND or medical needs requires further consideration as their additional needs make them more vulnerable. Individual behaviour plans are a way of planning ahead for such eventualities and allow parents to work with staff in constructing a plan that meets the individual needs of the pupil and provides a plan for all staff to be familiar with.

Schools and colleges should keep a record such as bound book (log) of incidents of Reasonable Force.

*Guidance from the Department of Education provides schools with the powers to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at: [Behaviour and discipline in schools - Publications - GOV.UK](#)*



HM Government guidance [Reducing the need for restraint and restrictive intervention](#) provides information on how to support children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention in special education settings. This guidance may also be helpful for schools and colleges.

#### Music tuition via Peri teachers at NHSG

*It is recognised that music tutors are vulnerable to allegations being made against them because they often work with children alone and the activity can involve some physical contact with a child.*

*Music tutors need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:*

- *ensure they behave in an appropriate manner and maintain professional boundaries at all times*
- *only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed*
- *make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why*
- *ask the child's permission first and respect their wishes*
- *report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken*
- *never travel alone with children in a car*
- *seek permission from parents before contacting children by mobile phone, for instance to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable.*

*The school/college should:*

- *carry out a risk assessment around providing music tuition. This should include:*
- *providing rooms/spaces that are adequately safe and open locations where the teacher can be easily observed by others, for example a door with glass in it*
  - *passing on any relevant information about children that may have a bearing on how they could react to physical contact so the tutor can adapt their practice accordingly*
- *let parents know when they arrange tuition what level of physical contact may take place as part of the activity*
- *record any reported incidents or issues and deal with these within the framework of the school's own policies*
- *make sure music tutors are aware of the school's safeguarding and staff conduct policies prior to starting.*

## **PART 5 Health and safety and risk assessments**

### **Responsibility for health and safety**

The Governing Board and head teacher will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within the school environment. Any health and safety policy adapted by the school will be based on the government guidance (link below) and will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves.

[Health and safety: Advice on legal duties and powers](#)

Day-to-day responsibility for health and safety issues in the school will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training. There should also be a named governor responsible for health and safety. These is:

**Name: Lisa Allen (KAPS)**  
**Designation:SBM, KAPS**  
**Contact details: lallen@kaps.croydon.sch.uk**

**Name: Richard McIntosh (KAPS)**  
**Designation: Governor with responsibility for health & safety**  
**Contact details: richard.mcintosh@btinternet.com**

**Name: Petra Lindsay**  
**Designation: SBM, NHSG**  
**Contact details: plindsay@nhsg.org.uk**

### **Risk assessments**

The school will seek to identify and manage risk through the use of risk assessments. These will be carried out:

- on an annual basis for the school environment as a whole.
- for all school trips.
- for pupils travelling between locations during the school day.
- for all work-based learning or work experience placements.
- when a pupil who has been excluded for risky or violent behaviour is returning to the school.
- whenever there are any changes to the school environment or school practices.
- following any serious incident including serious youth violence, harmful sexual behaviour and/or harassment.

Consideration should also be given to conducting risk assessments before PTA and other parent led events (e.g. fireworks or fairs) where people outside the school may have unregulated access or the usual measures for health and safety may not be sufficient.

### **Working with aggressive and violent parents**

Where schools are working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher/ principal and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

### **Site security and visitors**

- The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The head teacher will ensure that contractors have received the appropriate level of DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher/principal will request written confirmation that relevant checks have been carried out for that individual.
- All visitors and contractors will be:
  - informed to report to reception on arrival.
  - expected to provide proof of identity
  - expected to wear a name-badge or carry some form of identification at all times when on the school premises.
  - suitably supervised by school staff at all times.
  - made aware of school health and safety procedures.

- The head teacher will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

### **Use of the school premises by other organisations**

The school will only allow use of the school premises by other organisations or schools outside of school hours for the purposes of providing supplemental schooling if:

- the school's incorporating document allows this.
- the organisation provides an overview of what it intends to teach so that the Head teacher, in line with the school letting policy, is able to make a judgement on whether this is in line with the promotion of British values.
- the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks.
- reasonable due diligence checks are taken out on the organisation by the school.

### **Monitoring and review**

To enable the school to monitor the safety of the premises and the school environment, as well as the implementation of policies, the head teacher/principal and the governing board will ensure that.

- all school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and agreed by the governing board.
- the school keeps a central record of all accidents and incidents including what action was taken and by whom.
- staff are aware of their responsibility to record accidents and incidents.
- the head teacher has an overview all accidents/incidents.
- serious accidents and incidents are reported to the Governing Board.
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children.
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school/college safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

## Role of the designated safeguarding lead

The role of the designated safeguarding lead and their deputies is to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) within the school and to be available during school hours for staff to discuss safeguarding concerns. This role should be explicit within their job description. They **MUST** be a **senior member** of staff from within the **school's leadership team**

The designated safeguarding lead (and their deputies) will:

- liaise with and manage referrals to relevant agencies such as Children's Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).
- keep the head teacher informed of on-going safeguarding and child protection issues and enquiries, especially section 47 enquiries.
- provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes 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.
- ensure the school's safeguarding and child protection policies are up to date and consistent with Croydon's Safeguarding Children Board policies and that policies are reviewed annually.
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1, the school's Code of Conduct, the School Safeguarding Policy including the Annex to this policy for their school and the Behaviour Policy. They will be a point of contact for advice and support for staff as well as safeguarding partners.
- attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices.
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues
- provide regular updates to all staff members and governors on any changes in safeguarding or child protection legislation.
- Liaise with the mental health lead, where safeguarding concerns link to mental health.
- have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs.
- liaise with the designated teacher for CLA whenever there are safeguarding concerns relating to a looked after child or previously looked after child.

- oversee child protection systems within the school/college, including the management of records, standards of recording concerns and referral processes.
- provide a link between the school/college and other agencies, particularly children's social care and the Croydon Safeguarding Children Partnership.
- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years.
- ensure parents are fully aware of the school/college policies and procedures and that they are kept informed and involved.
- all records are kept up to date and stored securely. It is good practise to keep a separate child protection file
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer. Schools will gain a receipt when passing files to a new provision. This should be within 5 days of transfer.

FULL Details of the role of the designated safeguarding lead and deputy can be found in annex C of KCSIE 2023. It is important that the DSL and DDSL are fully aware of their role and have capacity to carry out all areas of this.

## Annex 2

### Early Years Settings Within Schools

This section relates only KAPS

#### Legal and policy framework

As an early years provider, delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.

[Statutory framework for the early years foundation stage](#)

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are child protection concerns.

#### Safeguarding and child protection

All safeguarding and child protection policies listed in sections 3 and 4 of this policy will apply equally to children in early years settings so far as they are relevant to that age group.

In addition, the school has the following child protection policies:

A policy on the use of mobile phones and cameras within the early years setting. recommended policies are:

- parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile.
- parents are generally prohibited from taking any photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared.
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose.
- staff do not bring personal mobile phones into the early years setting and use them only during breaks in the staff room.
- the staff will adhere to the E-Safety Policy at all times.
- photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. Where photographs and videos will involve LAC pupils, adopted pupils or pupils for whom there are security concerns, a member of the Senior Leadership Team will liaise with the Designated Safeguarding Lead to determine the steps involved. The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with a pupil.
- staff will report any concerns about another staff member's use of mobile phones to the Designated Safeguarding Lead. and

- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting.

### **Suitable people and Safer Recruitment**

The school will follow the safer recruitment policy set out in section 6 of this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children and have the relevant qualifications.

Staff policies set out in section 6 of this policy will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive appropriate training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Croydon policy, '[The Management of Allegations against staff who work with Children and Young People](#)' as referred to in section 6 of this document.

Where early years staff are taking medication that may affect their ability to care for young children, this will be notified to the head teacher.

Childcare Disqualification – Appropriate checks should be made if there are concerns about a member of the team or the provision's management to make sure they are not disqualified from working in childcare. All information can be found in the [statutory guidance](#).

### **Staff training, skills and supervision**

- all staff in early years settings have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy.
- all policies set out in section 7 of this policy will apply equally to early years staff.
- all early years staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take.
- all early years staff are able to communicate effectively in English both orally and in writing.
- a member of staff who holds a current paediatric first aid certificate is available on the school premises at all times and accompanies children on school trips.
- each child in the early years setting has a designated keyworker who liaises with parents to provide individual support for the child.
- a record is kept of staff training – type of training and dates which is recorded on the single central register (SCR)

### **Staff ratios**

The school will ensure that:

- staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe.
- children are kept within staff sight and hearing at all times.

For nursery classes:

- there will be at least one member of staff for every 13 children
- at least one member of staff will hold a full and relevant level 3 qualification.

For reception classes:

- class sizes will be limited to 30 pupils
- classes will be lead by a qualified teacher supported by suitably qualified support staff.

For before and after school provision, schools will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

## **Health**

The school will:

- promote the health of children attending the early years provision
- take necessary steps to stop the spread of infection
- administer medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner
- notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days.

## **Health and safety and suitability of premises**

The school will ensure that all indoor and outdoor spaces and facilities used for early years settings are safe and fit for purpose and comply with school policies and standards for site safety and health and safety as set out section 5 of this policy. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details, and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

## **Managing behaviour**

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened.

[Behaviour and discipline in schools](#)



## CHILD PROTECTION. DEFINITIONS AND INDICATORS

### Definitions

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse as well as witnessing the ill-treatment of others. Under the Children Act 1989, CSSW have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

**Neglect:** failure to provide basic care to meet the child's physical needs, such as not providing adequate food, clothing or shelter. failure to protect the child from harm or ensure access to medical care and treatment.

**Physical abuse:** causing physical harm or injury to a child.

**Sexual abuse:** involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

**Emotional abuse:** failure to provide love and warmth that affects the child's emotional development. psychological ill treatment of a child through bullying, intimidation or threats.

### Possible indicators of abuse and neglect

|   |  |
|---|--|
| <b>Neglect</b>                                  | <ul style="list-style-type: none"> <li>● Inadequate or inappropriate clothing</li> <li>● Appears underweight and unwell and seems constantly hungry</li> <li>● Failure to thrive physically and appears tired and listless</li> <li>● Dirty or unhygienic appearance</li> <li>● Frequent unexplained absences from school</li> <li>● Lack of parental supervision</li> </ul>   |
| <b>Physical abuse</b>                           | <ul style="list-style-type: none"> <li>● Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>● Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>● High frequency of injuries</li> <li>● Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>  |
| <b>Sexual abuse</b>                             | <ul style="list-style-type: none"> <li>● Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</li> <li>● Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li> <li>● Continual, inappropriate or excessive masturbation</li> <li>● Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>● Unwillingness to undress for sports</li> </ul> |
| <b>Emotional abuse</b>                          | <ul style="list-style-type: none"> <li>● Developmental delay</li> <li>● Attachment difficulties with parents and others</li> <li>● Withdrawal and low self-esteem</li> </ul>   |
| <b>Indirect indicators of abuse and neglect</b> | <ul style="list-style-type: none"> <li>● Sudden changes in behaviour</li> <li>● Withdrawal and low self-esteem</li> <li>● Eating disorders</li> <li>● Aggressive behaviour towards others</li> <li>● Sudden unexplained absences from school</li> <li>● Drug/alcohol misuse</li> <li>● Running away/going missing</li> <li>● Absence from school</li> </ul>  |
| <b>Parental attributes</b>                      | <ul style="list-style-type: none"> <li>● Misusing drugs and/or alcohol</li> <li>● Physical/mental health or learning difficulties</li> <li>● Domestic violence</li> <li>● Avoiding contact with school and other professionals</li> </ul>  |

## **NHSG Child on child Abuse Policy**

Whether this was a one-off incident, or longer in duration. 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. 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. Avoid language that may create a 'blame' culture and leave a child labelled. Staff will talk to the children in a calm and consistent manner. Staff will not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

### **1. Taking Action (Safeguarding team will)**

- Always take complaints seriously
- Gain a statement of facts from the pupil(s)
- Assess needs of victim and alleged perpetrator
- Consider referral to Police or Social Care
- Contribute to multi-agency assessments
- Convene a risk management meeting
- Record all incidents and all action taken

### **2. Recording sexualised behaviour (All staff)**

- Be clear, explicit and non-avoidant, and avoid vague statements or euphemisms
- Record as soon as possible, as you can quickly forget or confuse detail
- Follow the prompts on your safeguarding and child protection recording form
- Use proper names for body parts but record exactly any language or vocabulary used by the child. Use the child's exact words in quotation marks.
- Note where and when the incident happened and whether anyone else was around.

### **3. Gather the Facts**

Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. Ask the young people to tell you what happened. Use open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?). Do not interrogate or ask

leading questions.

### **4. Consider the Intent**

*Has this been a deliberate or contrived situation for a young person to be able to harm another?*

### **5. Decide on your next course of action**

If you believe any young person to be at risk of significant harm you must report to the Designated Safeguarding Lead immediately; they will follow the school's Safeguarding and Child Protection Policy.

If MASH and the police intend to pursue this further, they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to. It is important to be prepared for every situation and the potential time it may take.

### **6. Informing parents/carers**

The best way to inform parents/carers is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their child is the child who was harmed or who harmed another. Is the pupil 13+ and does not want to share with parents? Use the 'Gillick' test and the 'Fraser' guidelines.

<https://www.nspcc.org.uk/preventing-abuse/child-protection-system/legal-definition-childrights-law/gillick-competency-fraser-guidelines/>

In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to share the information with their parent/carer (they may be scared to tell parents/carers that they are being harmed in any way).

## **7. Points to consider**

### **7.1 What is the age of the children involved?**

How old are the young people involved in the incident and is there any age difference between those involved? In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however, should not be overlooked.

### **7.2 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?

### **7.3 What was the explanation by all children involved of what occurred?**

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

### **7.4 What is each of the children's own understanding of what occurred?**

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning Child-on-child Abuse Policy about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have an understanding of the impact of their behaviour on the other person?

## **7.5 Repetition**

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

## **8. 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

### **8.1 For the young person who has been harmed**

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. 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 which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people, 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 online bullying, relationship abuse etc.

## **8.2 For the young person who has displayed harmful behaviour**

It is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves, in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary.

Particular support from identified services may be necessary through an early help referral and the young person may require additional support from family members. Once the support required to meet the individual needs of the young person has been met, it is important that the young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person 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 young person 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). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education elsewhere.

It may be that the behaviour that the young person 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 young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person 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 internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

## **8.3 After care**

It is important that following the incident the young people 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 young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). For this reason, regular reviews with the young people following the incident(s) are imperative.

## **9. Preventative Strategies**

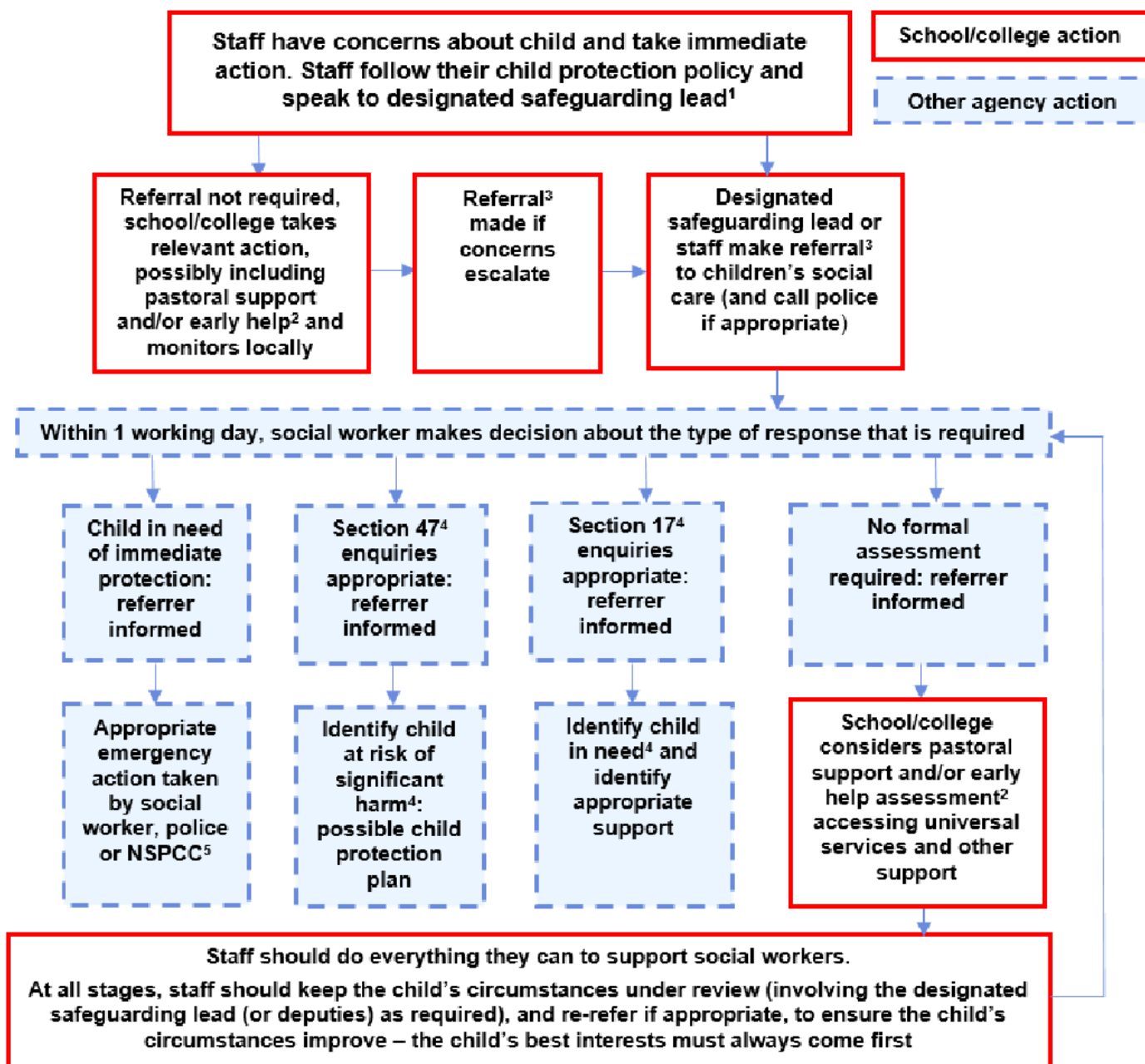
Child on child abuse can and will occur on any site even with the most robust policies and Support processes. It is important to develop appropriate strategies to proactively prevent child-on-child abuse. The schools have open environments where young people feel safe to share information about anything that is upsetting or worrying them. There is a strong and positive PSHE/RSHE curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. The school makes sure that 'support and report' signposting is available to young people.

Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff will consider each issue and each individual in their own right before taking action.

Young people are part of changing their circumstances and, through school council/student executive team and pupil Voice for example, we encourage young people to support changes and develop 'rules of acceptable behaviour'. We involve pupils in the positive ethos in school; one where all young people understand the boundaries of behaviour before it becomes abusive.

<https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour/preventing>

**Actions where there are concerns about a child (P22 KCSIE Sept 2023)**



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Annex 6: School Single Central Record/Register (SCR)

### Please note:

- Checks carried out on volunteers, maintained school governors and local governors in an academy trust do not need to be recorded on the SCR under the latest version of Keeping Children Safe in Education (KCSIE), **but it is recommend including them**
- KCSIE does not say specifically that contractors must be on the SCR, but it does say all staff who work at the school must be included, including supply staff, so it's best to include contractors too
- Where academies are mentioned, this includes free schools

### Important notes

This record should indicate what checks have been taken out for the following:

- For schools, all staff, including supply staff and teacher trainees on salaried routes, who work in school and others who work in regular contact children in school, including volunteers and governors
- For independent schools, including academies and free schools as above plus all members of the proprietorial body and involved in the management of the school
- For colleges, all staff providing education and/or whose positions involve a relevant activity

### Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

### Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.
- Existing volunteers who provide personal care, the school should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a school can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgement made about the need for an enhanced DBS check.
- Supervision of volunteers – there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children.

### Regulated activity

Regulated activity (see p171 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly. where this is the case an enhanced DBS check is needed with a barred list check.

### Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS check if a check is required, eg if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

### Documents and certificates

Please give details of any documentary evidence obtained as part of each check. Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retained any longer than six months. Other documents to verify identity, right to work in the UK etc, should be kept in personnel files.

## Model Single Central Record/Register Document

| Name | Date of service | Address | DOB | Evidence of identity:<br>(Initials of person carrying out check and date of check) | Barred list check (date and initials of person carrying out check) | Enhanced DBS check (date and initials of person carrying out check) | Prohibition from teaching check (date and initials of person carrying out check) | Section 128 check (date and initials of person carrying out check) | Further checks on persons who have worked outside the UK (date and initials of person carrying out check) | Checks on professional qualifications/ Certificates obtained (date and initials of person carrying out check) | Checks on right to work in the UK/documents obtained (date and initials of person carrying out check) |
|------|-----------------|---------|-----|--|--|---|--|--|---|---|---|
|      |                 |         |     |  |  |   |  |  |   |   |   |
|      |                 |         |     |  |  |   |  |  |   |   |   |
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|      |                 |         |     |  |  |   |  |  |   |   |   |

### Key:

*Use this to confirm full names when initials have been used*

It is recommended to have this document in Excel, separate tabs can be created and separate spreadsheets completed for the various roles within school:

Teaching staff, Support staff including office staff and site staff, Supply Staff, Volunteers, Governing board, contractors

## Our Keeping Ourselves Safe Behaviour Code

### Why have this code?

We know that when children use sexualised language to talk about other children this is hurtful and makes children feel angry, ashamed, sad and confused because they have told us this. They feel vulnerable and worried that this will keep happening and will happen inside and outside of school.

We know this is wrong and that if we don't do anything about the use of bad language this will get worse and may become physical and can cause problems in the future with feeling safe, trusting people and making good choices.

We know that people can be frightened to say something in case it doesn't stop or that they get accused of telling tales or 'snitching'.

As adults, we know children need to tell us to make it stop but that sometimes this is difficult for them and that sometimes children say and do things when they are angry and lash out at others.

We know that child-on-child abuse is where a pupil's behaviour is likely to cause significant harm to other pupils. This can involve sexual, physical or emotional abuse of another young person/s. For example, children may abuse other children because of their race, sexual orientation, religion, disability etc.

As a TEAM we have created the following Keeping Ourselves Safe Behaviour Code to make sure everyone knows what is expected of them and feels safe, respected and valued at Kensington Avenue Primary School and that we have ZERO-Tolerance for any child-on-child harassment, abuse and violence.

We will ensure that everyone has seen, understood and agreed to follow the code of behaviour, and that they understand what to do and what will happen if there is inappropriate behaviour. This includes staff, pupils, volunteers and families.

### What are we trying to do?

- To recognise acceptable and unacceptable behaviour.
- To know that reporting it to an adult is the right thing to do.
- To recognise when people can be trusted and when things are a problem.
- To be safe, respected and valued **all** times, outside school and online too.
- To grow children's' self-esteem, self-respect and self-confidence.
- To recognise and respect the rights of others.
- To take responsibility for our own behaviour.
- To help resolve conflicts.
- To know what will happen if you decide not to follow the code.

### If we don't have a code what could happen?



- Risk of physical and sexual abuse
- Risk of Sexual harassment and violence
- Possible emotional harm
- Increased risk of on and offline bullying
- Experiencing teenage relationship abuse by not understanding your rights
- Being enticed into gang activity

**What is the code?**

**You Will:**

- listen to others when they tell you they don't agree with your behaviour
- treat everyone with respect, being supportive and kind where needed
- take responsibility for your own behaviour
- talk to trusted adults about anything that worries or concerns you
- follow this code of behaviour and other rules (including the law)

**You Won't:**

- disrespect anyone else
- bully (online or offline)
- behave in a way that could be intimidating or is unwanted conduct of a sexual nature
- be abusive towards anyone.

**Adults Will:**

- Praise children for demonstrating honesty, kindness, and respect for others.
- Give children opportunities to voice their opinions and encourage them to listen to other people's views.
- Investigate every time someone tells us a concern.
- Help children understand that "no" means "no" and make sure they know who to talk to if they are ever uncomfortable with something they have been asked them to do.
- Work with children to resolve conflicts and help them understand how others might be affected.
- Ensure children get the support they need if they stop following the code using a stepped approach.
- Talk to children about bullying in all its forms and make sure they know how to get help if they need it.

## **What happens if we do not to follow the Keeping Ourselves Safe Behaviour Code?**

### **First incident**

If you behave in a way that doesn't follow our keeping ourselves safe behaviour code, we will remind you about it and ask you to change your behaviour. This will be recorded on CPOMs.

This gives you the chance to think and to plan how you could behave differently, with support from staff. You will be asked to apologise to the person you have used inappropriate behaviour against.

### **Second incident**

If you continue not to follow the code of behaviour after your first reminder, or if your behaviour is more serious, you will be given a formal sanction by your class teacher, usually a time out to reflect on the impact of your behaviour, as well as apologising to the person/s you have been unkind to.

They will make a record on CPOMs about what happened and inform your parents or carers. They will also talk with you about what happened and agree what support you need to improve your behaviour in the future.

We might also decide that further steps should be taken, such as restricting you from taking part in some activities until we know you are using the code.

### **Formal sanction**

If the support we have put in place isn't helping you to change your behaviour, we might need to give you a final warning. Again, this will be recorded and we will inform your parents or carers.

At this point, we will talk with you and your parents or carers, as by now you have not responded to the support given and your actions have made others feel intimidated, degraded or humiliated and/or have created a hostile, offensive or sexualised environment on more than one occasion. We may need to discuss accessing other services that might be better placed to give you the support you need.

A formal sanction will result in an internal exclusion or fixed term suspension.

### **Child protection procedures**

If any member of staff or volunteer becomes concerned that your behaviour suggests you might be in need of protection or that you might present a risk of harm to other children and young people, they will follow our child protection procedures. This might involve making a referral to the local authority.

If child protection procedures are necessary we will talk this through with you and your parents as soon as possible, unless doing so would put you in danger or interfere with a police investigation.

### **The Role of Parents and Carers**

We see parents and carers as important in encouraging positive behaviour and will involve them as appropriate. We will always inform and involve your parents or carers if you receive a formal warning about your behaviour, unless doing so would put you in danger.



# Kensington Avenue Primary School

## **Managing To Go Continence Guidelines and Procedures**

**Last reviewed on:  
September 2021**

**Next review due by:  
September 2024**

'Managing to Go'

A Continence Policy

Kensington Avenue Primary School

*KAPS Inclusion Statement*

*Dear Children*

*At KAPS we all work together to make sure all of you and your families achieve your best and have lots of opportunities in your lives, now and in the future. We are all very proud of the diversity at our school and every single one of you and your families matter, you are all different and valued equally. We want you to learn and achieve your best but we also want you to develop respect, understanding and knowledge of your community and the world around you. The world always changes and we want you and your families to be happy and successful in our multi-cultural, 21<sup>st</sup> Century modern Britain.*

**Rationale:**

Achieving continence is one of the many developmental milestones usually reached within the context of learning before a child transfers to nursery. However we acknowledge that there may be children with longer term continence issues for whom an individual health care plan may need to be put in place. In addition there may be children joining us in school who are at various points of developing their independence in toileting that require short term support in this important area of self care.

No child will be refused a place in school in relation to continence issues and in house documentation for parents will openly acknowledge this.

Kensington Avenue Primary School is committed wholeheartedly to working with children, parents and any support agencies deemed necessary to ensure appropriate provision is made for all children with needs in this specific area of personal development and in so doing fulfil a commitment to the promotion of our inclusive school ethos .

We accept our responsibility to meet the needs of children with delayed personal development in the same way we aim to meet the needs of children with delayed language or any other kind of delayed development. We aim to make reasonable adjustments to meet the needs of each child.

### **Principles:**

We can help pupils with continence/ bowel issues by:

- Understanding that bladder problems or delayed bladder control may be the result of a number of factors – most of which are outside the child's control.
- Recognise that the achievement of full bladder control can take time and some children may require bladder training programmes in order to be able to achieve this.
- Encourage the removal of disposable 'pull ups' for nursery aged children if delayed toilet training is not due to a diagnosed underlying medical condition.
- In conjunction with the family, liaise with the school nurse or other appropriate healthcare professional to support and implement any toileting programmes.
- Ensure that each affected child has an individual care plan drawn up in conjunction with the parents and school nurse or other appropriate health care professional to ensure that the child's toileting needs are appropriately managed in school.
- Support any bladder or toileting programme that is in place by allowing free access to the toilet as necessary.
- Promote independence as much as possible by supporting the child to enable them to self-manage their toileting in an age / developmentally appropriate way.
- Be alert to the potential for bullying and name calling by addressing any wetting accidents in as discreet a way as possible.
- Respect the child's right to privacy about their condition – the child and family should decide how much and what other pupils are told about the condition.

## **Child Protection**

- We have no anticipation that the changing of a child either in nappies or otherwise should raise any issues of child protection as all staff have been CRB checked. Therefore it will be normal practice for only one adult to be involved in attending to a child's personal needs. The person attending to a child will always be a member of the school staff. Students on placement will not be involved in supporting children in this area of care.
- At all times staff will be encouraged to remain highly vigilant for any signs or symptom of improper practice, as they do for all activities within school.
- If any marks or injuries are noticed on a child during changing this should be immediately referred to the Designated Person to follow up.

## **Agreeing a procedure for personal care**

Parents will be kept fully informed of the procedures the school will follow should their child need changing during school time. This information will be shared at entry meetings and reinforced on home visits when a leaflet detailing procedures will be shared. Admission paperwork will include parental consent for children to be changed. A copy of the school policy will be made available on the school website or is available on request. Guidelines for staff involved in the process as detailed below will be visibly displayed in both designated changing areas. This will ensure they follow the correct procedure.

## **Agreed Procedure for Changing Children:**

- Children should be changed standing up.
- The child's skin should be cleaned with a disposable wipe.
- Creams/lotions should be labelled with the child's name and only if prescribed for that child - they must NOT BE SHARED. Application of cream will be documented.
- Any creams should be used sparingly as if applied too thickly they can reduce the absorbency of the nappy. Where possible it is preferable for children to apply the cream under adult supervision.

- Disposable gloves should be worn when changing nappies. The nappy should be folded inward to cover faecal material and double-wrapped in a nappy bag. Soiled nappies should be disposed of into the pedal bin provided. The disposal bin should be lined with a disposable liner and emptied daily, replacing the used liner. These bins should be stored away from the reach of children.
- Any soiled or damp clothing should be placed in a plastic carrier bag and stored for a temporary basis in the changing area and given to parents at the end of the session.
- Once the child has been changed and removed from the changing area, the surface should be cleaned with a detergent spray or antibacterial wipes and left to dry.
- Gloves and aprons and any items used for cleaning the changing area will be disposed of in the pedal bins provided.
- Hands should be thoroughly washed afterwards.
- Should a child with particularly complex needs be admitted the school will work closely with the health care professionals involved in any forward planning activity. Reasonable adjustments will be agreed in partnership with families/carers and on the advice of external professionals. A care plan will also be agreed and signed by parents/carers.

#### **Procedures:**

- Parents attend an induction meeting prior to their child starting school.
- Complete an individual health care plan (IHCP)
- Parent/ school agreement signed
- Referrals made to any other relevant partner agencies via CAF



## Resources

| <u>Early Years</u>                        | <u>Key stages 1 &amp; 2</u>                     |
|---|---|
| 1. Disposable gloves and aprons           | 1. Disposable gloves and aprons                 |
| 2. Wet wipes                              | 2. Wet wipes                                    |
| 3. Spare nappies and/or pull up           | 3. Where necessary spare nappies and/or pull up |
| 4. Nappy sacks                            | 4. Nappy sacks                                  |
| 5. Separate bin for disposal of nappies   | 5. Separate bin for disposal of nappies         |
| 6. A selection of suitable spare clothing | 6. Spare underwear                              |
| 7. Plastic bags for wet/soiled clothing   | 7. Plastic bags for wet/soiled clothing         |
| 8. Antibacterial cleanser                 | 8. Antibacterial cleanser                       |
| 9. Air Freshener                          | 9. Air Freshener                                |

If a child accidentally wets or soils him/herself they will be attended to as referred to above, dependent on need and age.

Staff involved in this procedure will be expected to wear disposable gloves. Aprons provided will be considered appropriate for staff involved in nappy changing.

Wet or soiled nappies will be double wrapped and disposed of via the normal domestic waste route. Gloves and aprons and any items used for cleaning the changing area will be disposed of in the pedal bins.

Wet or soiled underwear/clothing will be returned to parents. Temporary storage of these will be in the designated changing area prior to the child being collected at the end of the session.

The changing area will be cleaned after use.

Hot water and liquid soap will be available to wash hands as soon as the task is complete. A hot dryer and/or paper towels will be available for drying hands.

### **Keys to success**

A successful transition to independence in this area of self care is more likely to be achieved when we, as practitioners work closely with parents with a positive approach to supporting the child in this aspect of their development.

We will not assume that the child has failed to achieve full continence because this has not been attempted in the home. However, where this is the case we will have a positive and structured approach developed, in partnership with parents and carers, to ensure a successful outcome for a child.

If there is further concern that delayed continence may be linked with delays in other aspects of the child's development this will be sensitively discussed with parents and carers and a specifically planned programme be jointly developed and agreed.

There are other professionals who can help with advice and support. The Family Health Visitor or appropriate nurse will have knowledge of who can be contacted to offer support and advice in this area. Health care professionals can also carry out a full health assessment in order to rule out any medical cause of continence problems.

# Changing Chart

| Date | Name of Child | Changed: -<br>Nappy (N)<br>Pull ups (PU)<br>Pants (P) | List of clothing provided (if any) | Changed by<br>(please initial) |
|------|---------------|---|------------------------------------|--------------------------------|
|      |               |   |                                    |                                |
|      |               |   |                                    |                                |
|      |               |   |                                    |                                |
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