# Bedford High School
## A Specialist Business and Enterprise College
To Care To Learn To Achieve



# Safeguarding, Child Protection and Early Help Policy

| School Address | Manchester Road Leigh WN7 2LU |
|---|---|
| **School Contact Number** | 01942 909009 |

Document control

| Date created | October 2020 |
|---|---|
| Revision due | September 2021 |
| Current author | Rebecca Ramsden |
| Governing Committee | Standards |
| Electronic copies of this plan are available from | FROG VLN |
| Hard copies of this plan are available from | School Business and Finance Manager / HR Manager |
| Public sector equality duty guidance considered | Yes |
| Date approved by the Chair of the Governing Body | 27th September 2021 |
| Signature of the Chair of the Governing Body | |

Changes History

| Version | Date | Description | Changes |
|---|---|---|---|
| 2 | September 2021 | Changes to guidance in line with KCSIE 2021 Changes to La thresholds Changes to staffing | |

# Safeguarding, Child Protection and Early Help Policy

## October 2020

Bedford High School

| | |
|---|---|
| **Policy agreed (date):** | 9th November 2020                     . |
| **Policy published** (including on website) **(date):** | January 2021 |
| **Next review (date):** | October 2022                     . |
| **Policy Status:** | Statutory |

**Key Contacts**

Table of identified persons with specific lead responsibilities in relation to Safeguarding and other key agencies.

| Key Safeguarding Personnel | | | |
|---|---|---|---|
| Role | Name | Telephone | Email |
| Head teacher | Paul McCaffery | 01942 909009 | P.McCaffery@bedford.wigan.sch.uk |
| Designated Safeguarding Lead (DSL) | Rebecca Ramsden | | r.ramsden@bedford.wigan.sch.uk |
| Deputy Designated Safeguarding Lead (DDSL) | Paul McCaffery Bridget Moss | | h.phillips@bedford.wigan.sch.uk b.moss@bedford.wigan.sch.uk p.mccaffery@bedford.wigan.sch.uk |
| Safeguarding Mentor | Sue Critchley | 01942 909009 | s.critchely@bedford.wigan.sch.uk |
| Pastoral Guidance Officers | Emma Derbyshire Sian Walsh Helen Haseldon Lynsey Aaron Cheryl Green | 01942 909009 | |
| Early Helps Coordinator | Sadia Hussain | 01942 909009 | s.hussain@bedford.wigan.sch.uk |
| Nominated Governor/Trustee | Mrs J Coop | N/A | |
| Chair of Governors/Trustees | David Whitehead | N/A | |
| Designated Teacher for Looked After Children | Rebecca Ramsden | 01942 909009 | r.ramsden@bedford.wigan.sch.uk |
| **The key safeguarding responsibilities within each of the key roles above are set out in Keeping Children Safe in Education (2021)** | | | |
| **Agency Contact Details** | | | |
| Local Authority Designated Officer | Sue Wharton | 01942 486042 | lado@wigan.gov.uk |
| Children's Social Care referrals | Duty Team | 01942 828300 | https://www.wigan.gov.uk/Resident/Health-Social-Care/Children-and-young-people/ProfessionalReferralForm.aspx CINteam@wigan.gov.uk |
| Early Help Hub | StartWell | 01942 486262 | CINteam@wigan.gov.uk |

| | | | |
|---|---|---|---|
| Wigan Safeguarding Children's Board | | 01942 486025 | wscb@wigan.gov.uk |
| Link Social Worker | Daniel Feeley | 01942 404769 | d.feeley@wigan.gov.uk |
| CAMHS Link worker | Paula Derbyshire | 07919 304613 | p.derbyshire@nhs.net |
| School Nursing / Health Visiting service | Shannon Roberts | 01942 483558 | Shannon.roberts1@nhs.net |
| Police | | 101 / 999 | |
| CSE Team | | 0161 8565959 | |
| Channel Helpline | | 020 7340 7264 | |
| If you believe a child or young person is **at immediate risk** of significant harm or injury, contact the **Police on 999** | | | |

# Bedford High School Contextual Information

Bedford High School is an inclusive, mixed gender comprehensive school, with approximately 1070 students on roll. The demographics of our students are largely of white British ethnic origin, who mostly have English as a first language. Our number of EAL students on roll is lower than the national average. Over 40% of students are eligible for free school meals, which is higher than national average.

Safeguarding incidents can be associated with factors outside the school and/or can occur between children outside the school. The DSL will consider the context within which such incidents occur. This contextual safeguarding means that safeguarding assessments also consider wider environmental factors present in a young person's life, and specific to our local area that may potentially affect the welfare and safety of our young people. Contextual information may be included in referrals to external agencies and social care to aid the referral process. The DSL/DDSL attends the 'Team Around the School' meeting every term to help contextualise safeguarding information and inform Personal Development planning.

# 1. Introduction

This policy is specifically aimed for:
- The Senior Leadership Team and Governing Body
- All Teachers and Support Staff
- All Visitors (including external agencies, trainee teachers and community lettings)
- Alternative Provisions and Work Experience Providers

The aim of this policy is to ensure:
- All of our students are safe and protected from harm
- Safeguarding procedures are in place to help students to feel safe and learn to stay safe
- Adults in the school are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection.
- All agencies are providing appropriate support to young people through adoption of the early help framework

This will be achieved by:

- Supporting the young person's development in ways that will foster security, confidence and independence.
- Providing a high quality, safe and stimulating environment in which young people feel safe, secure, valued and respected, feel confident, and are able to enjoy, learn and grow in confidence.
- Students having positive relationships with the adults caring for them and them knowing how to approach adults if they are in difficulties, believing they will be effectively listened to.
- Raising the awareness of all teaching and support staff of the need to safeguard young people, of their responsibilities in identifying and reporting possible cases of abuse and preventing and intervening earlier to address support and social needs of young people through the early help framework
- Providing a systematic means of monitoring young people known or thought to be at risk of harm and ensuring we, Bedford High School, contribute to assessments of need and support packages for those students.

- Emphasising the need for good levels of communication between all members of staff.
- Developing a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.  Also, that staff have had access to specific training and awareness raising concerning:
    - Code of Conduct for employees in school
    - Designated Safeguarding Lead (DSL)/ Deputy Designated Safeguarding Lead (DDSL) training
    - KCSiE 2021
    - Looked After Children (CLA)
    - Online safety training
    - Preventing Radicalisation
    - Safeguarding training for all staff
    - Whistleblowing
- Developing and promoting effective working relationships with other key agencies, especially the Police, Health and Social Care.
- Ensuring that all staff working within our education setting who have substantial access to children and young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check [1](according to guidance) and a central record is kept for audit
- Curriculum – teaching about safeguarding**:** Our students access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.  We provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. The Personal Development curriculum specifically includes the following objectives:

- Developing student self-esteem
- Developing strategies for risk management and self-protection including online safety
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

## 2. Legislation and statutory guidance

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

This policy is also based on the following legislation:

> Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of students

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

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

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

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

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

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

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

Other key documents are noted, which have prompted changes to safeguarding requirements over time. This policy references these throughout where relevant:

- The Children and Social Work Act 2017.
- Wigan Council Safeguarding, Child Protection and Early Help Policy (2020)
- School Attendance: Guidance for maintained schools, academies, independent schools and local authorities August 2020 (updated 2021)
- GDPR and the Data Protection Act 2018.
- Information Sharing: Advice for Practitioners 2018.
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (guidance document) 2018.

This policy should also be read in conjunction with Wigan's Threshold of Need Document / Procedure and Wigan's Resolution Policy.


## 3. Definitions

Safeguarding is defined as:

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

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe from suffering or being likely to suffer from significant harm. This incorporates student health and safety; school behaviour and preventing bullying; supporting students with medical conditions; personal, health, social economic education; providing first aid and site security. Consequently this policy is consistent with all other policies adopted by the governors.

All staff are aware of the categories of abuse, which are:
- ➢ Physical abuse
- ➢ Emotional Abuse
- ➢ Neglect
- ➢ Sexual abuse

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

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

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

**Children** includes everyone under the age of 18.

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

- ❯ The local authority (LA)
- ❯ A clinical commissioning group for an area within the Wigan LA
- ❯ The chief officer of police for a police area in the Wigan LA area

*Appendix one and two: Definitions, signs and symptoms of the four categories of abuse

# 4. Equality statement

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

We give special consideration to children who:

- ❯ Have special educational needs (SEN) or disabilities or health conditions
- ❯ Are young carers
- ❯ May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- ❯ Have English as an additional language
- ❯ Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- ❯ Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- ❯ Are asylum seekers
- ❯ Are at risk due to either their own or a family member's mental health needs
- ❯ Are looked after or previously looked after
- ❯ Are missing from education

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

This policy assumes that any of the categories of abuse could be disclosed within the Borough of Wigan, and gives further information relating to individual types of abuse within this document in line with advice and guidance within Keeping Children Safe in Education 2021.

## 5. Expectations

All staff:

- Understand this safeguarding policy and will adhere to our safeguarding expectations
- Are alert to signs and indicators of possible abuse and will act appropriately at all times.
- Will record and report concerns as set out in this policy by using CPOMS.
- Are confident when dealing with a disclosure of abuse from a student.
- Are able to contribute to the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 and Annex B of the latest version of Keeping Children Safe in Education (KCSiE 2021). The full document is also available to all staff.

We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our students from harm and that the young person's welfare is our paramount concern.

All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual young person.

We recognise that a young person who is neglected, abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of worth. This may affect their presenting behaviours and additional support may be required.

We recognise that the school may provide the only stability in the lives of some young people who have been abused or are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn**.**

We recognise that the early help framework provides opportunities to intervene early and prevent safeguarding issues developing, as well providing a framework for appropriate support to be wrapped around the young person and their family.

## 6. Responding to and Reporting Concerns

During term time, the DSL and/or a DDSL is always available during school hours for staff to discuss any safeguarding concerns. Any changes to this are shown on the daily cover

list. Out of term time, the DSL and/or Headteacher are available to contact via phone or email (see contact list).

An instruction of how to record concerns on CPOMS and how to record concerns regarding guest students can be found in the appendix.

The voice of the child is central to our safeguarding practice and students are encouraged to express and have their views given due weight in all matters affecting them.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a student is being privately fostered, we remind the carer/parent of their legal duty to notify Wigan Children's Social Care. We follow this up by contacting Children's Social Care directly.

Staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

**Do:**
- **Create a safe environment for the student.**
- **Stay calm** and reassure the student. Do not show that you are shocked or upset.
- **Listen carefully** and **tell** the child what you are going to do next.
- **Believe** what the student is telling you.
- Use the **'tell me', 'explain', 'describe'** strategy.
- **Tell only the Designated or Deputy Safeguarding Lead.**
- **Record** in detail using CPOMS without delay, using the child's own words where possible.

**Don't:**
- Take photographs of any injuries.
- Postpone or delay the opportunity for the student to talk.
- Take notes while the student is speaking or ask the student to write an account.
- Try to investigate the allegation yourself.
- Promise confidentiality, eg. Say you will keep 'the secret'.
- Approach or inform the alleged abuser.
- Ignore a student's intentional/unintentional disclosure.
- Ask leading questions

All staff record any concern about or disclosure by a student of abuse or neglect and report this to the DSL using CPOMS. It is the responsibility of each adult in school to ensure that

the DSL receives the record of concern without delay. In the unlikely absence of the DSL or DDSL, staff will seek advice direct from Children's Social Care.

If a concern is identified beyond usual working hours (i.e. in the community), the staff member must still report the concern on CPOMS. If the concern poses immediate risk, the staff member is expected to take appropriate action (contact Wigan Social Care and/or the Police).

**Immediate Risk of Harm (including risk of suicide, self-harm in school, physical/sexual abuse or refusal to go home):**

- Report to DSL immediately. Do this face to face or by phone.
- Lesson may need to be covered by HOD/DO.
- The DSL may ask the pastoral team to take appropriate action.
- Record accurately on CPOMS.
- The DSL/DDSL will make an immediate referral to Social Care and/or the emergency services
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from children's social care. Staff can also seek advice at any time from the NSPCC helpline on 0808 800 5000. All concerns/actions must be recorded on CPOMS as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

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

**Significant Risk of Harm (including mental health concerns, recent self-harm, neglect, emotional abuse, peer on peer abuse, online risk):**

- Report to DSL as soon as possible (within the hour). Do this face to face or by phone. The DSL will need enough time to assess the situation and put a plan in place if necessary.
- The DSL may ask the pastoral team to take appropriate action.
- Record accurately on CPOMS.

**Risk of Harm (including unexplained changes to behaviour/presentation, community concerns, pastoral concerns, historic self-harm)**

- Report to the DSL as soon as possible but no later than the end of the school day to allow for appropriate actions/conversations to take place.
- Record accurately on CPOMS.


# 7. Specific Safeguarding Concerns

**Concerns about Female Genital Mutilation (FGM)**

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
Possible indicators that a studenthas already been subjected to FGM, and factors that suggest a studentmay be at risk, are set out in the appendix.

**Any teacher** who either:
- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
Unless they have been specifically told not to disclose, they should also report on CPOMS, discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must report concerns on CPOMS, speak to the DSL.

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

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out must report the concerns on CPOMS and speak to the DSL.

### Concerns about extremism

Staff have a responsibility to report all concerns regarding possible extremism on CPOMS.

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

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

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if:
- someone is in immediate danger

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

- See or hear something that may be terrorist-related


### Preventing Radicalisation

Protecting young people from the risk of radicalisation is seen as part of our wider safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. As with managing other safeguarding risks, we are alert to changes in a young person's behaviour that could indicate that they are in need of protection. Staff use their professional judgement in identifying young people who

might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Our school safeguarding policy is therefore written to comply with the schools duty under Section 26 of the Counter Terrorism and Security Act 2015 in accordance with the Department of  Education advice for schools specific guidance for schools https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

Our school safeguarding policy will be aligned with and reflect the processes described in the Wigan's Prevent Policy and Procedure.


### Concerns about Serious Violence

Through regular training all staff are aware of indicators, which may signal that young people are at risk from, or are involved with serious violence or serious violent crime. Indicators may include increased absence from school, changes in peer relationships, unexplained gifts and decline of SEMH or signs of physical injury. All staff are trained to report concerns of any such indicators to the DSL immediately. Additional advice is provided in the Home Office's 'Preventing Youth Violence and Gang Involvement' and its 'Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance'.

### Concerns about Domestic Abuse

We recognise the significant impact domestic abuse can have on children and young people, therefore we operate in partnership with Operation Encompass, a system which facilitates the sharing of information relating to domestic incidents where children live or frequent. Any incidents of domestic violence reported to the police will be notified to the education setting to effectively support the child(ren) / young person.
The police inform the DSL of an Operation Emcompass notification, with a brief outline of the incident. The DSL then contacts the named person for further information and subsequently stores information on CPOMS. The shared information is used to help support the young person and family through a potentially traumatic event.

### Mental Health Concerns

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

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

All mental health concerns must be reported on CPOMS and followed up by speaking to the DSL/DDSL

Additional Information: Department for Education guidance on **mental health and behaviour in schools**


### Responsibilities for Children Missing from Education (CME):

> The school must enter students on the admission register at the beginning of the first day on which the setting has agreed, or been notified, that the student will attend. If a student fails to attend on the agreed or notified date, the education setting should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity

> The school must monitor students' attendance through their daily register. We agree to inform local authorities of the details of students who fail to attend regularly, or have missed ten school days or more without permission. We will monitor attendance closely and address poor or irregular attendance.

> The school must also arrange full-time education for excluded students from the sixth school day of a fixed period exclusion. This information can be found in the *Exclusion from maintained schools, academies and student referral units in England* statutory guidance.

> As part of our duty, we will investigate any unexplained absences. Further information about schools' safeguarding responsibilities can be found in the Keeping Children Safe in Education.

> The school will make reasonable enquiries for children missing in education. The term 'reasonable enquiries' grants schools and local authorities a degree of flexibility in decision-making, particularly as the steps that need to be taken in a given case will vary. The term 'reasonable' also makes clear that there is a limit to what the school and local authority is expected to do.

> In line with the duty under section 10 of the Children Act 2004, the expectation is that the school and the local authority will have in place procedures designed to carry out reasonable enquiries. The type of procedures may include the appropriate person checking with relatives, neighbours, landlords – private or social housing providers – and other local stakeholders who are involved. We also record that we have completed these procedures. If there is reason to believe a young person is in immediate danger or at risk of harm, a referral will be made to children's social care (and the police if appropriate).

**Staff report immediately to the DSL, if they know of any child who may be:**

> Missing – whereabouts unknown and unable to make contact (as a result of making reasonable enquiries)

> Missing education – (compulsory school age (5-16) with no school place and not electively home educated)

The Local Authority requires Education Settings to complete the **'Children Missing Education'** referral form. This form should be completed once the setting has completed reasonable enquires, but failed to locate the child following 10 days of absence. The first part should be completed by school and submitted to the Early Help Hub CINteam@Wigan.gov.uk . The EHH will then complete further checks to ensure all lines of enquiry have been exhausted, before it is agreed the child is removed from roll.

Making these enquiries may not always lead to establishing the location of the child, but will provide a steer on what action should be taken next, for example, to contact the police, children's social care and, in cases where there may be concerns for the safety of a child who has travelled abroad, the Foreign and Commonwealth Office.

Where a student has not returned to school for ten days after an authorised absence, or is absent from school without authorisation for twenty consecutive school days they can only be removed from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if the school and the local authority have failed to establish the student's whereabouts after **jointly** making reasonable enquiries. This only applies if the setting does not have reasonable grounds to believe that the student is unable to attend because of sickness or unavoidable cause.

**Young Carers**

14

A young carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled or misuses drugs or alcohol.
We recognise the impact that being a Young Carer can have on students, and the importance of identifying those young people so that appropriate support can be provided.
Wigan Safeguarding Children Board coordinates our local Young Carers Strategy.
Where a student at our school is identified as having additional support needs due to being a young carer, or where a multi-agency approach may be required, our school will adopt the use of the Early Help Framework.

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

All staff should take care not to place themselves in a vulnerable position with a child.

All staff adhere to the staff code of conduct and Behaviour Management Policy and this is part of induction for all new staff or volunteers.

Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, will be given at induction, alongside information on Safer Working Practices.

We understand that a student may make an allegation against a member of staff.
If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children / young people, the member of staff receiving the allegation or aware of the information, will immediately inform the DSL and/or HR Manager, who will liaise with the headteacher. The Head teacher and/or DSL, on all such occasions, will discuss the content of the allegation with the Local Authority Designated Officer (LADO).

If the allegation made to a member of staff concerns the Headteacher / Head of School, the person receiving the allegation will immediately inform the Chair of Governors / Trustees who will consult LADO, without notifying the Headteacher first.

The school will follow Wigan's procedures for managing allegations against staff. Under no circumstances will we send a child / young person home pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.

Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of Human Resources / Legal in order to make that decision and informing the LADO at the earliest opportunity.

In the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of Governors / Trustees with advice as outlined above.

We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

## Disagreements, Escalation and Resolution

Effective working together depends on an open approach and honest relationships between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they

15

believe a decision to act / not act in response to a concern raised about a child is wrong. In such cases the WSCB Case Resolution Protocol (formerly escalation policy) is used if necessary. If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

**Whistleblowing**

All staff can raise concerns about poor or unsafe practice and potential failures in the education settings safeguarding regime. Our whistleblowing procedures, which are reflected in staff training and our Code of Conduct, are in place for such concerns to be raised with the DSL or Headteacher.

If a staff member feels unable to raise an issue with DSL or Headteacher or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline - Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email help@nspcc.org.uk.
- A member of the governing body: Chair of Governors

We recognise that children and young people cannot be expected to raise concerns in an environment where staff fails to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitudes or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the whistleblowing policy.

Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Body.

It's acknowledged that Whistle blowers have the right to remain anonymous, however identifying yourself may assist with any further investigations.

**Allegations of abuse made against other students**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.
We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

> Is serious, and potentially a criminal offence

> Could put students in the school at risk

> Is violent

> Involves students being forced to use drugs or alcohol

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

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

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

> Staff must record the allegation on CPOMS and inform the DSL, but staff do not investigate it

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

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

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

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

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse,

and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

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

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

> Ensure our curriculum helps to educate students about appropriate behaviour and consent

> Ensure students are able to easily and confidently report abuse

> Ensure staff reassure victims that they are being taken seriously

> Ensure staff are trained to understand:

  o How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports

  o That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

  o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

    ▪ Children can show signs or act in ways they hope adults will notice and react to

    ▪ A friend may make a report

    ▪ A member of staff may overhear a conversation

    ▪ A child's behaviour might indicate that something is wrong

  o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- o That a studentharming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- o The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- o That they should speak to the DSL if they have any concerns

**Concerns Regarding Sharing of Nudes and Semi-nudes ('sexting')**

**Staff responsibilities when responding to an incident**

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), this must be reported on CPOMS and the DSL informed immediately.

Staff must **not**:

> View, copy, print, share, store or save the imagery, or ask a student to share or download it (if staff have already viewed the imagery by accident, this must be reported this to the DSL)

> Delete the imagery or ask the student to delete it

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

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

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

Staff should explain that they need to report the incident, and reassure the student(s) that they will receive support and help from the DSL and/or relevant member of the pastoral team.

**Initial review meeting**

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

> Whether there is an immediate risk to student(s)

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

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

> What further information is required to decide on the best response

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

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

> Any relevant facts about the student involved which would influence risk assessment

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

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

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

> The incident involves an adult

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

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

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

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

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

**Further review by the DSL**

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

They will hold interviews with the students involved (if appropriate).
If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

**Informing parents/carers**

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

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through by reporting to 101.

**Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS.

**Curriculum coverage**
Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PDE and ICT curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

> What it is

> How it is most likely to be encountered

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

> Issues of legality

> The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

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

> The receipt of such images

### The 4 key categories of risk

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

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

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

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

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

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

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

   o The safe use of social media, the internet and technology

   o Keeping personal information private

   o How to recognise unacceptable behaviour online

   o How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim

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

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

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

   o Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present

   o Staff will not take pictures or recordings of students on their personal phones or cameras

- Make all students and staff aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

## 8. Students with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these students through our SEND team.

## 9. Students with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

## 10. Looked-after and previously looked-after children

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

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

> The DSL and safeguarding mentor have details of student's social workers and relevant virtual school heads

We have appointed a designated teacher, [Rebecca Ramsden], who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is also the DSL and is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

> Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

> Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 11. Complaints and concerns about school safeguarding policies

**Complaints against staff**

Complaints against staff that are likely to require a safeguarding investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

**Other complaints**

Complaints regarding safeguarding procedures will be handled in accordance with our complaints policy and dealt with in a timely manner by the DSL or a senior member of staff.

## 12. Record-keeping

We will hold records in line with our records retention schedule.
All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS.

Records will include:
> A clear and comprehensive summary of the concern

> Details of how the concern was followed up and resolved

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

Concerns and referrals will be held on CPOMS for each child.

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

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

# 13. Online Safety

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

To address this, our school aims to:
> Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
> Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
> Set clear guidelines for the use of mobile phones for the whole school community. Mobiles are allowed in school, but must not be seen, heard or used at any point during the school day.
> Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

All concerns regarding online safety, must be recorded on CPOMS and the DSL notified.

# 14. Roles and responsibilities

We take responsibility for the safeguarding and welfare of all students, including those who are temporarily educated off-site and guest students on roll at other provisions.

Our health and safety policy, set out in a separate document, reflects the consideration we give to the protection of our young people both physically within the school environment and for example, in relation to internet use, and when away from the school, undertaking off site trips and visits.

School security guidance has been compiled to support the senior leadership team in the discharge of their responsibilities by ensuring the development and implementation of suitable procedures. In particular, maintaining the security of the premises in response to potential threats to the staff and students / students of the setting.

We ensure that all staff, governors and visitors know who the DSL/DDSL is and how to make contact.

**Governors and Headteacher**:

1. The Governing body and Headteacher takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to

work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering / at risk of suffering abuse and neglect.

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

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

4. Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

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

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

7. Governors will work with the Headteacher and senior leaders to make sure the key actions are set out and adhered to by all staff:

   - There is a safeguarding policy together with a code of conduct for employees in school
   - The school operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training.[2]
   - The school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have, had they not resigned.
   - A senior leader has Designated Safeguarding Lead (DSL) responsibility.
   - On appointment, the DSL undertakes interagency training and also undertakes DSL "new to role" training and an "update" course every 2 years.
   - All other staff have access to safeguarding training as appropriate.
   - Any weaknesses in Child Protection processes and procedures are remedied immediately.
   - The Governing body and Headteacher will consider how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through Personal Development and Ethics (PDE).
   - That enhanced DBS checks are in place for all Governors.
   - The nominated governor for safeguarding liaises with the headteacher and the DSL to complete an annual Section 175 safeguarding audit to return to the local authority.

8. The governing body and Headteacher understand that Keeping Children Safe in Education (KCSIE) is statutory guidance that we must have regard to it when carrying out our duties to safeguard and promote the welfare of young people.

9. The governing body and the headteacher ensure the DSL is given additional time, funding, resources and support as necessary to fulfil the role. This includes ensuring there is adequate cover available if the DSL is absent.

**The Designated Safeguarding Lead (DSL)**

1. The DSL leads on all safeguarding issues and cannot delegate this responsibility. The DSL may however ask staff members to complete specific actions related to a safeguarding issue.

---

[2] Safer recruitment training can be accessed through Wigan Safeguarding Children's Board

2. The DSL is a member of the Senior Leadership team who has; along with the deputy designated safeguarding lead(s), undertaken the relevant training, and, upon appointment will undertake DSL new to role training followed by biannual updates.
3. The DSL is should use the additional time, funding training resources and support to:
   a. Provide advice and support to other staff on child welfare and child protection matters
   b. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
   c. Contribute to the assessment of children
   d. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

4. The DSL has completed safer recruitment training, which is renewed every 2 years.

5. The names of the DSL's and DDSL's are clearly visible in the school and on the school website, with a statement explaining Bedford's role in referring and monitoring cases of suspected abuse.
6. When the DSL is absent, this is shown on the daily cover list and a named DDSL is identified. If the DSL needs to leave the school site at any point during working hours, the headteacher and DDSL are notified.
7. The DSL's will liaise with all appropriate stakeholders and offer advice in response to concerns raised by staff members. This may include referring a young person to Social Care if there are any concerns about possible abuse. The DSL will use the Wigan Council 'Threshold of Need' guidance as a reference point prior to completing a referral.
8. The DSL will keep accurate records on CPOMS of concerns about a young person, even if there is no need to make an immediate referral. All such records are kept confidentially, securely stored and are separate from student records.
9. The DSL ensures all records are transferred securely and held by the setting where the student attends until their 25th birthday. Records should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware.
10. The DSL will ensure that all records are kept and retained in line with the "Record retention" policy, Children looked after records are retained for 99 years, and a record is kept and witnessed of the disposal of individual's record.
11. The DSL will arrange appropriate and regular safeguarding CPD for all members of staff and disseminate regular updates via bulletins and emails.
12. The DSL will facilitate induction training for all new members of staff and trainee teachers. The DSL will be available to offer ongoing induction support to all new members of staff.
13. The DSL refers Child protection and safeguarding concerns or allegations against adults working in the school to the LADO [3] .Any member of staff found not suitable to work with children or young people will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.
14. The Health and Safety Manager completes an annual check of site security and reports findings to the DSL and Headteacher.

---

[3] LADO Local Authority Designated Officer for allegations against staff. LADO threshold document can be found here https://www.wigan.gov.uk/Docs/PDF/WSCB/LADO-threshold.pdf

15. The DSL ensures that they, or the staff member attending case conferences, core groups, early help meetings or other multi-agency planning meetings, contribute to assessments and provide a report which has been shared appropriate stakeholders and recorded on CPOMS
16. The DSL ensures that any student currently with a child protection plan who is absent from school without explanation for two days is referred to their key worker's Social Care Team.
17. The DSL will inform the Headteacher of escalating safeguarding cases, especially section 47 enquiries and incidents involving CLA students.
18. The DSL will provide the headteacher and governing body an annual report, detailing contextual safeguarding information and key safeguarding priorities, any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and a number of children on the child protection register (anonymised).

**All Staff:**

1. Key safeguarding policies and procedures are shared with all staff annually. Policies, procedures and updates are shared via newsletters, emails, face to face training, notice board updates, induction training and online training. All staff are expected to sign to confirm they have read and understand our safeguarding related policies. All staff are expected to ask for clarification if they do not understand any section of a policy or procedure.
2. All staff must read and ensure they understand 'Keeping Children Safe in Education 2021 (part 1) and Annex B of KCSIE and adhere fully to its expectations. All staff will sign a declaration at the beginning of each year to confirm their understanding of the updated guidance.
3. All staff must be aware that they have a professional responsibility to be vigilant, have professional curiosity and share accurate information and concerns with the DSL in order to safeguard children and cannot assume that someone else will pass on the information. All concerns are reported on CPOMS as promptly as possible.
4. All staff must report any safeguarding concerns regarding guest students, using the 'Guest Student Safeguarding Log' and hand deliver it to the DSL.
5. All staff complete safeguarding training annually to maintain their understanding of the signs and indicators of abuse.
6. All staff will be aware of our systems which support safeguarding, including this policy, the staff handbook, the role and identity of the designated safeguarding lead (DSL) and deputy designated safeguarding lead, the behaviour policy and the safeguarding response to children who go missing from education
7. All staff are aware of the early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals are requested
8. All staff are aware of the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
9. All staff know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
10. All staff are aware of the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

11. All staff are aware of the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

**12.** All staff are expected to wear their ID badge with a black lanyard, to indicate they are a member of staff. Staff are also expected to stop and question any person who is not wearing an appropriate ID badge. In this instance, the person must be escorted to the main reception and the DSL notified.

**13.** All teachers understand that The Teachers Standards 2012 state that teachers should safeguard children's wellbeing and maintain public trust in their teaching profession as part of their professional duties.

**14.** Whilst all staff must report FGM concerns to the DSL immediately, staff have a specific legal duty to report concerns directly to the police. The DSL will support staff with this.

**15.** There may be times when it is necessary to transport students in staff vehicles. When this situation occurs, there must be two members of staff present at all times to ensure both the staff and student are safeguarded.

**16.** Pastoral and attendance staff may on occasion complete home visits / door-step visits. When undertaking home visits for the first time, staff should be accompanied and risk assess for subsequent visits. The member of staff must only enter the property if an adult is present. All home visits must be recorded on CPOMS.

**All Parents and Carers**

1. All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the school's Safeguarding, Child protection and Early Help policy, and reference to it is on the school website and FROG Parent Portal.
2. When visiting the school all parents/carers are expected to sign in/out at the main reception and wear a visitor ID badge.
3. All parents are expected to respect our school as a professional and safe environment for young people and behave in an appropriate manner at all times.

**All Visitors:**

1. All visitors are expected to sign in/out at the main reception and wear a visitor ID badge.
2. All visitors (expect parents) are also expected to attach their ID badge to an appropriately coloured lanyard:
    a. Yellow – Governors
    b. Green – DBS checked (logged on SCR)
    c. Red – DBS not checked.
3. All visitors are provided with safeguarding information including the contact details of safeguarding personnel.
4. Visitors of a professional role are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at the school.
5. Community users organising activities for children are aware of the school's child protection guidelines and procedures.
6. Our lettings policy, for community use of the premises, will seek to ensure the suitability of adults working with children on school sites at any time.

## 15. Safeguarding Students at Approved Off-Site Educational Provisions

Approved off-site educational activities, are where students take part in supervised activities such as field trips, educational visits or work experience. This also includes activities for students at alternative provisions. Students can only be recorded as receiving off-site

educational activity if the activity meets the requirements prescribed of the Education Regulations 2006. The activity must be of an educational nature approved by the headteacher and supervised by someone authorised by the Bedford High School. The activity must take place during the session for which the attendance mark is recorded. During approved off-site educational activities, agreed risk assessments must be adhered to and all safeguarding concerns reported to the Designated Safeguarding Lead

Alternative provision can be defined as something in which a student participates as part of their regular timetable, away from the school site and not led by Bedford High School staff. Care is taken when planning a placement at an alternative provision to ensure both provisions work together with other relevant agencies such as social care, educational psychology and CAMHS etc, to ensure students are safeguarded and appropriate support continues to be in place to meet the needs of the students. Students on placement at alternative provisions are safeguarded under the alternative provision's policy and procedures. However, there is an expectation that all concerns of a safeguarding nature are communicated between the designated safeguarding leads of both provisions and appropriate action is taken.

On occasion, students on roll at other provisions are placed at Bedford High School. This is usually a temporary placement and alternative to fixed term exclusions. Whilst in the care of Bedford High School, students will be safeguarded under our policy and procedures. All safeguarding concerns will be recorded using the 'Safeguarding Concerns for Guest Students' form (Appendix 6) and communicated with the donor school.

Attendance codes for when students are present at approved off-site educational activity are as follows:

**Code B**: Off-site educational activity
This code is used when students are present at an off-site educational activity that has been approved by the school. By using code B, we are certifying that the education is supervised and measures have been taken to safeguard students. This code is not used for any unsupervised educational activity. Arrangements are in place for the approved supervisor of any off-site educational provider to notify the Designated Safeguarding Lead of any safeguarding concerns.

**Code D**: Dual Registered - at another educational establishment
This code is used to indicate that the student was not expected to attend the session in question because they were scheduled to attend the other school at which they are registered.
Each school should only record the student's attendance and absence for those sessions that the student is scheduled to attend their school. Arrangements are in place to ensure all unexplained and unexpected absence is followed up in a timely manner by our attendance team.

**Code W**: Work experience
Work experience is for students at key stage 4. Attendance and safeguarding arrangements are in place whereby the work experience placement provider notifies the school of any absences by individual students and/or safeguarding concerns. The Designated Safeguarding Lead should be notified immediately of any safeguarding concerns and is expected to take necessary steps in accordance with the safeguarding policy.

## 16. Supporting Young People – Early Help Intervention

We will consider the need for an Early Help assessment when it is identified that there are low level concerns or emerging needs that can no longer be managed solely by in-house support. Although not exhaustive, highlighted concerns may include:

- Additional needs of the young person or parent
- Young Carer
- Anti-social / emerging criminal behaviours
- Repeated incidents of 'missing from home' reported
- Drug/alcohol misuse
- Poor attendance to school
- Increased risk of CSE/modern slavery/radicalisation/exploitation
- Increased vulnerabilities due to family circumstances, such as mental health concerns, drug/alcohol misuse, domestic violence or criminal activity.
- Private fostering arrangements
- Involvement with other external agencies.
- Previously CLA/CIN/CPCP

It is the responsibility of the key agency to initiate Early Help to identify what the family's strengths and needs are. This will inform whether the setting can support the family or whether a referral to another agency is needed. This process provides a way of recording support and interventions that have been provided by the school to the child / young person and also supports a referral for additional support that may be needed from more targeted services where a single agency has been unable to meet that need. A team around the child meeting (TAC) can be arranged to ensure that a multi-agency action plan can be developed. It is important that the child and parents voice is captured as part of this assessment and that they take ownership of the plan. This plan should be regularly reviewed up to 4 to 6 weeks until outcomes are achieved.

If at any point during the EH process, the risk increases and the school becomes concerned that the child or young person is, or is likely to suffer significant harm, then a referral will be made to children's social care.

In all cases the school will consider the statutory guidance for schools and colleges, Keeping Children Safe in Education, published by the DfE September 2021.

An Early Help may be considered, but after investigation not deemed necessary. In such cases, all details including reasons for not initiating an Early Help must be recorded on CPOMS.

# 17.   Information Sharing

We recognise that all matters relating to child protection are confidential[4] and information is handled in line with GDPR.

The Government has issued Information Sharing for Safeguarding Practitioners Guidance that included 7 'Golden Rules' of Information Sharing in safeguarding :

The Government guidance (described by the NSPCC, 2018) is:

---

[4]

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

1. **Remember that the General Data Protection Regulation (GDPR) Data Protection Act 2018 and human rights law are not barriers** to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. **Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.

5. **Consider safety and well-being**: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure**: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. **Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose

Sharing of information will be necessary for a safeguarding purpose only, is shared only with the DSL unless instructed otherwise, is accurate and up-to-date and recorded promptly and securely using CPOMS.

Key organisations who have a duty under section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:

• The local authority

• NHS England

• Clinical commissioning groups

• NHS Trusts, NHS Foundation Trusts

• The local policing body

• British Transport Police Authority

• Prisons

• National Probation Service and Community Rehabilitation Companies

• Youth offending teams

• Bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of section 74 of the Education and Skills Act 2008.

We will always undertake to share our intention to refer a child or young person to Social Care with their parent's / carers unless to do so could put the young person at greater risk of harm, or impede a criminal investigation.

As data controllers who process personal information we are registered with the Information Commissioner's Office.

# 18.    Supporting Staff

We will work with partners in the safeguarding partnership to ensure positive outcomes for young people.

We recognise that staff working in the school who have become involved with a student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL/DDSL and to seek further support as appropriate.

Designated Safeguarding Leads may make use of support available by the Local Authority and the partnerships Safeguarding Team.

# 19.    Training

All members of staff and volunteers have read, signed and understood the school's Staff Handbook and code of Conduct.

We ensure training attended meets the minimum standards set out by WSCB in the document 'WSCB recommended minimum standards for child protection training'.

**Induction**

The welfare of all our students is of paramount importance. All staff including volunteers are informed of our safeguarding procedures including online safety, at induction. Our induction also includes:

- Plan of support for individuals appropriate to the role for which they have been hired
- Confirmation of the conduct expected of staff within the school – our Staff Code of Conduct
- Opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities
- Confirmation of the line management whereby any general concerns or issues about the person's ability or suitability will be addressed.
- An explanation of safeguarding procedures and the Early Help Framework

**Safeguarding training**

This training is for all staff and is updated annually to ensure staff understand their role in safeguarding.
In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as necessary and at least annually. All staff also receives training in online safety and this is updated as necessary.

**Advanced training**

The DSL, DDSL and Safeguarding Mentor have additional training which is updated every two years as a minimum. The DSL also attends multi-agency courses relevant to school needs. Their knowledge and skills are refreshed at least annually eg via e-bulletins or safeguarding networking events with other DSLs.

**Safer Recruitment**

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every three years as a minimum.

**Preventing Radicalisation**

All staff undertake annual Prevent training.

**Staff support**

Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their role with a senior leader and to seek further support as appropriate.

**Governors**

Governors undertake the school's Induction programme. They may choose to complete face to face training for governors provided by Wigan Council. In addition, all governors are requested to complete Level 1 safeguarding training annually.


# 20.    Physical Intervention and Use of Reasonable Force

We acknowledge that staff must only ever use physical intervention as a last resort, when a young person is endangering him / herself or others.
The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain young people. "Reasonable" in these circumstances means using no more force than necessary and staff should refer to the section on "use of reasonable force" within the behaviour policy.
Such events should be recorded by completing a serious incident log and signed by a witness. This must be uploaded to CPOMS and DSL notified.
Staff who are likely to need to use physical intervention or reasonable force will be appropriately trained in a Team Teach handling technique.
We understand that physical intervention of a nature which causes injury or distress to a child or young person may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context or working with children and young people, and all staff are aware of the safer working practice guidance[5] to ensure they are clear about their professional boundary.


# 21.    Monitoring and Evaluation

Our safeguarding policy and procedures will be monitored and updated by:

- Governing Body visits to the education setting
- SLT drop ins and discussions with young people and staff
- Student surveys
- Scrutiny of exclusion and attendance data
- Scrutiny of GB minutes

---

[5] Available to view on the WSCB website

- Scrutiny of CPOMS data
- Review of parental concerns and parent / carer questionnaires
- Review of the use of intervention strategies.

This policy should be read in conjunction with all other school policies and is reviewed at least annually.

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

## Appendix 1: types of abuse

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

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

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

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

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

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

> Seeing or hearing the ill-treatment of another

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

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

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

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

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

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

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

> Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

> Protect a child from physical and emotional harm or danger

> Ensure adequate supervision (including the use of inadequate care-givers)

> Ensure access to appropriate medical care or treatment

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

## Appendix 2: Safer recruitment and DBS checks – policy and procedures

### Recruitment and selection process

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

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### Advertising
When advertising roles, we will make clear:
> Our school's commitment to safeguarding and promoting the welfare of children

> That safeguarding checks will be undertaken

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

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

### Application forms

Our application forms will:

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

> Include a copy of, or link to, our safeguarding policy

### Shortlisting

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

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

> Explore all potential concerns

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

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

    o   If they have a criminal history

    o   Whether they are included on the barred list

    o   Whether they are prohibited from teaching

    o   Information about any criminal offences committed in any country in line with the law as applicable in England and Wales

    o   Any relevant overseas information

> Sign a declaration confirming the information they have provided is true

### Seeking references and checking employment history

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

When seeking references we will:

> Not accept open references

> Liaise directly with referees and verify any information contained within references with the referees

> Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations

> Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

> Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

> Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

> Resolve any concerns before any appointment is confirmed

**Interview and selection**

When interviewing candidates, we will:

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

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

> Record all information considered and decisions made

**Pre-appointment vetting checks**

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

**New staff**

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

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

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

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

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

> Verify their professional qualifications, as appropriate

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

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

   o For all staff, including teaching positions: criminal records checks for overseas applicants

   o For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

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

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

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

**Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:
> There are concerns about an existing member of staff's suitability to work with children; or

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

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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
> We believe the individual has engaged in relevant conduct; or

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

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

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

**Agency and third-party staff**

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

**Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:
> An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

We will obtain the DBS check for self-employed contractors.
We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
We will check the identity of all contractors and their staff on arrival at the school.

### Trainee/student teachers

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

### Volunteers

We will:
> Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

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

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

### Governors

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

### Staff working in alternative provision settings

Where we place a student 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 students 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 student 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.

## Appendix 3: allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.
This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

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

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

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

### Suspension of the accused until the case is resolved

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

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

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

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

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

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

### Definitions for outcomes of allegation investigations

> **Substantiated:** there is sufficient evidence to prove the allegation

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

> **False:** there is sufficient evidence to disprove the allegation

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

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

### Procedure for dealing with allegations

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

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

> Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

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

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

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

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

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

> **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

> Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

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

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

> Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

**Additional considerations for supply teachers and all contracted staff**

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

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

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

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

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

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

## Timescales

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

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

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

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

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

## Specific actions

**Action following a criminal investigation or prosecution**

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

**Conclusion of a case where the allegation is substantiated**

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

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

**Individuals returning to work after suspension**

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

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

**Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

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

**Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

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

## Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

## Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved

- Notes of any action taken, decisions reached and the outcome

- A declaration on whether the information will be referred to in any future reference

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We

will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### References

When providing employer references, we will:
> Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

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

### Learning lessons

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

- Issues arising from the decision to suspend the member of staff

- The duration of the suspension

- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

### Non-recent allegations

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

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

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

### Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education
This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:
> Suspicion

> Complaint

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

> Pre-employment vetting checks

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

### Definition of low-level concerns

43

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

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

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

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

> Being overly friendly with children

> Having favourites

> Taking photographs of children on their mobile phone

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

> Using inappropriate sexualised, intimidating or offensive language

### Sharing low-level concerns

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

We will create this culture by:

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

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

> Empowering staff to self-refer

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

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

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

### Responding to low-level concerns

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

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

> To the individual involved and any witnesses

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

### Record keeping

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

Records will be:

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

> Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

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

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

## References

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

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

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

## Appendix 4: specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B

## Children missing from education

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

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

> Are at risk of harm or neglect

> Are at risk of forced marriage or FGM

> Come from Gypsy, Roma, or Traveller families

> Come from the families of service personnel

> Go missing or run away from home or care

> Are supervised by the youth justice system

> Cease to attend a school

> Come from new migrant families

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

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

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

## Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

> Appearing with unexplained gifts or new possessions

> Associating with other young people involved in exploitation

> Suffering from changes in emotional wellbeing

> Misusing drugs and alcohol

> Going missing for periods of time or regularly coming home late

> Regularly missing school or education

> Not taking part in education

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

## Child sexual exploitation

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

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

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

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

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

> Having an older boyfriend or girlfriend

> Suffering from sexually transmitted infections or becoming pregnant

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

## Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

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

## Homelessness

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

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

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

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

Indicators that FGM has already occurred include:

> A student confiding in a professional that FGM has taken place

> A mother/family member disclosing that FGM has been carried out

> A family/student already being known to social services in relation to other safeguarding issues

> A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable

- Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating

- Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE

- Being repeatedly absent from school, or absent for a prolonged period

- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

- Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem

- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:
> The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

> FGM being known to be practised in the girl's community or country of origin

> A parent or family member expressing concern that FGM may be carried out

> A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

> A girl:

- Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society

- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

**Forced marriage**

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

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

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

The DSL will:

> Speak to the student about the concerns in a secure and private place

> Activate the local safeguarding procedures and refer the case to the local authority's designated officer

> Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

> Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

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

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

> **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in students' behaviour.

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

> Refusal to engage with, or becoming abusive to, peers who are different from themselves

> Becoming susceptible to conspiracy theories and feelings of persecution

> Changes in friendship groups and appearance

> Rejecting activities they used to enjoy

> Converting to a new religion

> Isolating themselves from family and friends

> Talking as if from a scripted speech

> An unwillingness or inability to discuss their views

> A sudden disrespectful attitude towards others

> Increased levels of anger

> Increased secretiveness, especially around internet use

> Expressions of sympathy for extremist ideologies and groups, or justification of their actions

> Accessing extremist material online, including on Facebook or Twitter

> Possessing extremist literature

> Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

## Peer-on-peer abuse

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

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

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

> Abuse in intimate personal relationships between peers

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

50

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

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

> Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

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

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

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

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

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

## Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

> Between 2 children of any age and sex

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

> Online and face to face (both physically and verbally)

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

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

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

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

Staff should be aware of the importance of:

> Challenging inappropriate behaviours

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

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

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

## Serious violence

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

> Increased absence from school

> Change in friendships or relationships with older individuals or groups

> Significant decline in performance

> Signs of self-harm or a significant change in wellbeing

> Signs of assault or unexplained injuries

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

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

> Being male

> Having been frequently absent or permanently excluded from school

> Having experienced child maltreatment

> Having been involved in offending, such as theft or robbery

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

## Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.
Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

> Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

> The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

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

*Appendix 5*

To : All Schools and Academies

| | |
|---|---|
| **Our reference:** | HRESC |
| **Your reference:** | |
| **Please ask for:** | HR Employment Service Centre |
| **Extension:** | 2333 |
| **Direct line:** | 01942 827333 |
| **Date:** | 8th May 2017 |

Dear Colleague

**<u>DBS Checks for School Visitors</u>**

I have been asked to confirm the situation regarding schools asking visitors to provide copies of their DBS certificate or DBS number. It is unlikely that visitors will carry their certificate with them and in many cases it will not be necessary for them to do so.

I can confirm that any visitor who is employed by Wigan Council will have had their post assessed for eligibility for a DBS Check, including an assessment of the work they do in schools. They would not have been employed without an acceptable clearance being received. Therefore, if your visitor is a current Wigan Council employee, you can be assured that they have received satisfactory clearance and you do not need to see it. You should of course check their Wigan Council badge to confirm their identity.

Further guidance on DBS checks for other visitors to school will follow.

I hope you find this advice useful. If you have any questions or wish to clarify any areas, please contact me. As lead counter signatory, I am available to provide advice on any DBS issue you may have.

Yours sincerely

Claire O'Sullivan
Lead Counter Signatory

# Bridgewater Community Healthcare **NHS**

## NHS Foundation Trust

**Human Resources**
Bevan House
Beecham Court
Smithy Brook Road
Wigan
WN3 6PR

Tel: 01942 482965

Wigan Borough Head Teachers
9th February 2017

Dear Head Teacher

**RE: DBS Checks**

Bridgewater Community Healthcare NHS Foundation Trust operates a Disclosure and Barring Service (DBS) Policy based on the requirements of the Police Act 1997 and the mandatory pre-employment checking procedure requirements of the Department of Health. The Policy ensures that enhanced DBS checks are mandatory for every staff member who has access to children or vulnerable adults as part of their normal duties or standard DBS checks for staff who have access to health care records. New staff are not allowed to start in post until their DBS and all other relevant pre-employment checks have been completed. Such checks must be satisfactory and in line with national NHS safe recruitment standards.

In line with the requirements of this Policy, all staff working with children or vulnerable adults are subject to enhanced DBS checks prior to being offered a contract of employment.

All Trust staff are required to display their identification badges on their person at all times to confirm to Schools and other providers that they are subject to this safeguarding process.

Where a DBS disclosure provides information about allegations and/or convictions relating to children or an allegation is made about an existing member of staff, the nominated Senior Officer will share that information with the Local Authority Designated Officer in accordance with the requirements of Safeguarding Vulnerable Groups Act 2006.

If you have any further queries, please do not hesitate to contact the Trust's Human Resources Department via the contact details detailed at the top of this letter.

We are more than happy to work with you and members of your Team to confirm/validate our staff members' identification when they present at your premises.

Yours sincerely
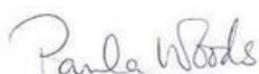
*Paula Woods*

**Paula Woods**
**Assistant Director Workforce**

*Appendix 7*

*School security guidance*

School Security
Guidance 07 18.pdf

## CHILDREN MISSING EDUCATION REFERRAL & CHECKLIST
## April 2020 v3

As outlined in the statutory guidance for Local Authorities 'Children Missing from Education' are children of compulsory school age who are not a registered pupil at a school or are not receiving suitable education other if they are not registered at a school.

Where a pupil has not returned to school for ten days without authorisation the school and the local authority have a responsibility to jointly make reasonable enquiries to establish the whereabouts of the child. The appropriate completion of this checklist ensures that the Local Authority and school have fulfilled this responsibility.

It is school's responsibility to follow up all unexplained and unexpected absences in a timely manner and every effort should be made to establish the reason for a pupil's absence. If you require advice and guidance please contact the Multi-Agency Safeguarding Team on 01942 828300.

It is important that one checklist is completed for each child within the family, please do not include all children on one.

During the first 10 days of absence (reason unknown), school must complete this referral form and checklist. Once completed if the child's whereabouts remains unknown, please make a referral to the Multi-Agency Safeguarding Team CINdutyteam@wigan.gov.uk within 5 days or earlier if all checks have been completed.

**At any point if you feel a child is at risk of significant harm, FGM, human trafficking or sexual exploitation refer immediately to social care please contact 01942 828300**

Please note that if the child is residing or located in the Wigan Borough, they are not a CME and should not be removed from school roll. Policies in relation to school attendance should be followed in these cases.

## CHILD'S INFORMATION:

| | | |
|---|---|---|
| Child's Name: | | DOB: |
| Child's Address: | | |
| Previous Address: (if known) | | |
| School: | | |
| Parent/carer's names: | | |
| Parent/carer's address: | | |
| Contact names & numbers: (include emergency) | | |
| Any known siblings & school: | | |
| Reason for CME checks: | | |
| Any other agencies involved: | | |
| Known vulnerability/risk factors <br> Do you feel this child is at risk of harm or neglect **Y/N** please provide detail: | | |
| Is this child Gypsy Roma Traveller? **Y/N** | | |
| Is this child parents service personnel? **Y/N** | | |
| Has this child had any Missing from home episodes? **Y/N** | | |
| Is this child known to the Youth Justice System? **Y/N** | | |
| Does this child have any SEN/learning needs? **Y/N** | | |
| Are there any other vulnerabilities you are aware of? Please provide detail; | | |
| Date: | | |

**All boxes must be completed, of not relevant please enter N/A**

## CHECKLIST:

| School checklist | Dates/ Times | Outcomes | Name |
|---|---|---|---|
| School to attempt to contact parent on first day of absence.<br><br>This includes Truancy Call, First Day calling, Text, Email, all emergency contacts. Please detail all contact methods - whether a message was left, if the phone is working, is there an international dialling tone. | | | |
| School to check possible whereabouts with staff and pupils?<br><br>This should include checking with family friends, all staff members, the child's friends, social media<br>Contact all emergency contact numbers you hold in school. | | | |
| Visit to address(es) by school.<br><br>Leave card if no answer<br>Does the property look empty?<br>Is someone at home but not answering the door?<br>NB if school policy does not permit home visit a police welfare check to be requested | | | |
| Contact made with involved agencies within 5 working days (Social Care, EMAS team, School Nurse etc) | | | |
| Contact made with agencies to understand when they last had contact/saw the child (no consent needed)<br>- Social care<br>- school nurse (when did health have any contact with the child) | | | |
| School to contact the new school or Local Authority the child is believed to have moved to? What were the outcomes?<br>https://www.gov.uk/find-local-council | | | |
| NB – Has the child been seen? State when & by whom<br>If not seen, what further action has been taken? (Refer to CME Policy Doc for advice) | | | |

**ALL BOXES MUST BE COMPLETED, IF NOT RELEVANT PLEASE ENTER N/A**

Please submit this referral to
CINdutyteam@wigan.gov.uk

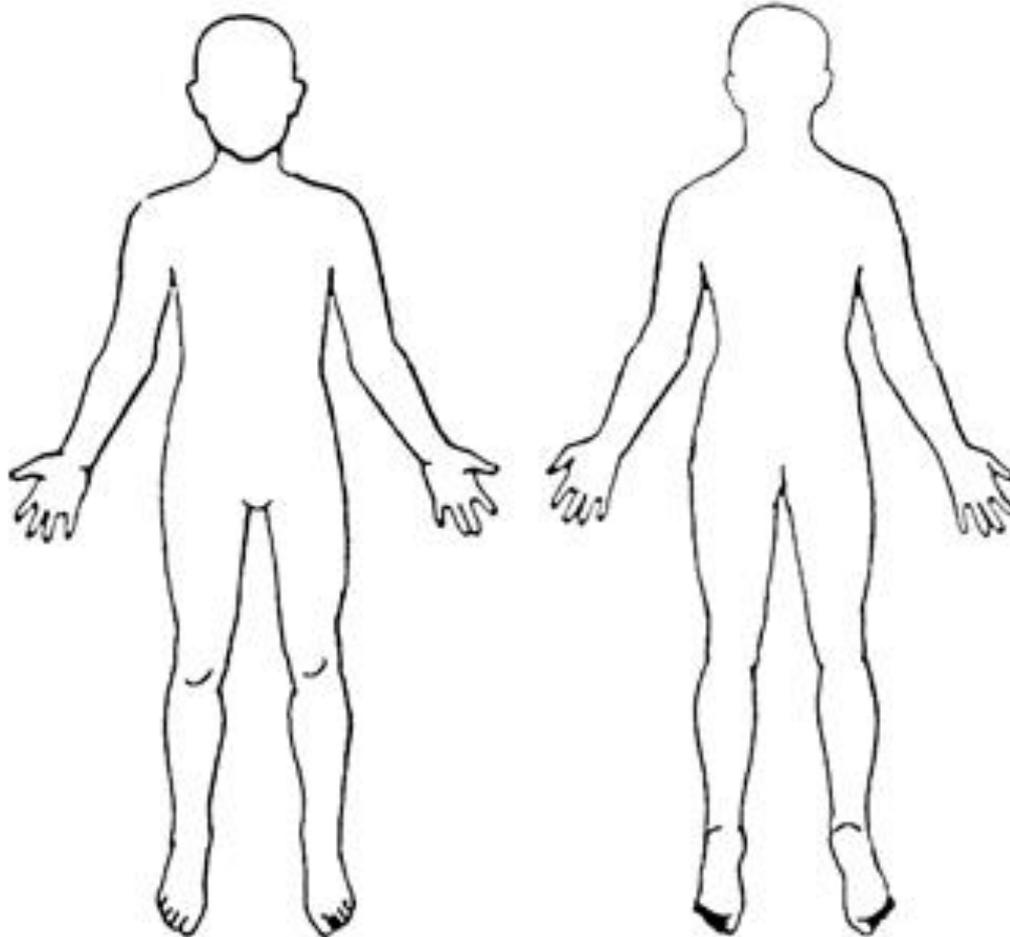Contact the MAST team on 01942 828300 for any further advice.

*Appendix 9*

**Bedford High School: Safeguarding Concerns Log for Guest Students**
**For use for ALL guest students ONLY. Students on roll at Bedford MUST be logged on CPOMS.**
**ALL completed forms MUST be hand delivered to the DSL / Deputy DSL**

| Student Name: | | Form: | |
|---|---|---|---|
| Date: | | Time: | |
| Logged by: | | Donor School: | |

**Incident Details (use back of sheet if necessary):**

**Categories (Highlight all appropriate):**

| Attendance / Ed Lounge / B Code | First Aid Administered | Pastoral Contact with Parents | Pastoral Contact with Student | Peer Abuse | Staff Allegation |
|---|---|---|---|---|---|
| CDT Professional Referral | CDT Contact | External Agency Referral (Not CDT) | MH/Wellbeing Forum Pastoral Referral | MH/Wellbeing | Home Issues |
| Encompass | Radicalisation | E-Safety | Child Sexual Exploitation (CSE) | Child Protection Incident | Special Guardianship Order (SGO) |
| Child Looked After (CLA) | Child In Need (CIN) | Child Protection Care Plan (CPCP) | Early Help Framework (EH) | EHCP | |
| | | | | | |
| **Linked Students:** | | | | | |
| **Body Map Attached: Y/N** | | | | | |
| **Alert:** | | | | | |

# **Body Map**



front                                    back

| Action Taken | By Whom | Date |
|---|---|---|
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

*Appendix 10*

**Logging a Safeguarding or Child Protection Incident using CPOMS**

The first time you log in:

1. Find the CPOMS shortcut on the Start menu or, enter bedfordhigh.cpoms.net in to the URL box at the top of the screen.

2. Enter your email address and click 'Reset Password'.

3. Go to your email and find the email from CPOMS, this email will contain a randomised password you should use the first time you log on.

4. Log in with your email address and password.

5. Change your password according to the guidance on the screen.

Subsequent log-ins:

Log in as above.

1. Click on ADD INCIDENT at the top of the screen.

2. Add content in the INCIDENT box.

3. Click a CATEGORY from the list below this.

4. If any students are linked to this incident, click their names in the LINKED STUDENT(S) box. As you type, it will search for you.

5. DATE/TIME will appear automatically as the time you are reporting, so no need to change these unless you are reporting after the event, in which case change them to the accurate time.

6. Click on a panel to ALERT STAFF MEMBERS. ALWAYS select **Designated Safeguarding Lead** from the list and if appropriate, click on more groups. Once you click a group, you will have the option to remove staff members from the list if you don't wish to inform the whole group, eg. PGO's.

7. Upload a FILE if you need to. EG. This could be a photograph of a letter photograph linked to the incident, which has been passed to you.

8. Add an AGENCY INVOLVED by clicking on the drop-down and ticking. If you are unaware of any agency that the student may be referred to, just leave it blank.

9. Click on ADD INCIDENT at the bottom. An alert will now be sent to the person(s) you directed it to, plus Rebecca Ramsden.

Please note:

If you forget your password, simply go to CPOMS home page, enter your email address and click on reset password as per the first-time log-in procedure.

It is your responsibility to close CPOMS immediately or go to 'blank screen' mode one you has logged an incident. It will log you out after 10 minutes of idle time but logging yourself out immediately lessens the risk.

## <u>Bedford High School: Early Help Pre-Assessment</u>

Understanding thresholds for levels of support is vital to providing a solid, integrated intervention that will help students achieve their full potential. As the needs of students change we must provide 'the right intervention and help at the right time'.

At Bedford High School, the Early Help Assessment process will usually be instigated by the PGO, Safeguarding Mentor or named key worker who has identified emerging or more complex sustained needs, where mainstream pastoral support alone is no longer able to fully meet the needs of the student.

The process involves carrying out a Pre-Early Help Assessment to identify the concerns and determine the needs.
If a multi-agency approach is required an Early Help Assessment Meeting will be arranged to start the process. It is important that the student and parent's voice is captured as part of the Early Help Assessment process and that they have ownership of their action plan. The plan should then be reviewed every 4-6 weeks until outcomes have been achieved.

The Pastoral Team should consider the need for an Early Help Assessment for a student who is for example:
• Showing early signs of neglect.
• Disengaged from education, has poor attendance.
• Displaying behaviours which impact on their emotional and physical wellbeing such as alcohol misuse or missing from home.
• At risk of CSE.
• Showing signs of engaging in anti-social or criminal behaviour.
• Living in a family where there are challenges for the child, such as substance misuse, adult mental health and domestic abuse.
• Disabled and has specific additional needs.
• Has special education needs.

An Early Help relies on full engagement from the family and student. If a family does not agree to an Early Help Assessment, the staff member will discuss the case with the DSL and a professional referral to Children's Social Care might be necessary as a result of this.
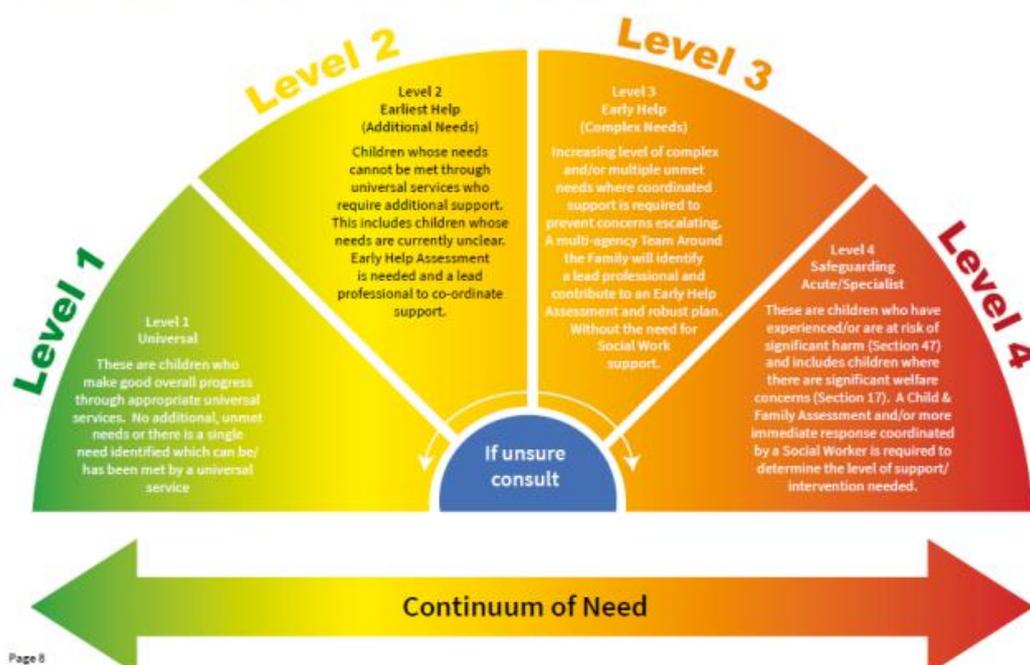
**Understanding Thresholds**

The diagram above illustrates the different thresholds of need and appropriate responses.

**Level 1 -** All children accessing mainstream services with low-level need – **Needs usually met by BHS pastoral/learning support.**

**Level 2 -** Children with emerging needs or low level CSE concerns that can be met with the support of a
multi-agency Early Help assessment and plan – **Needs increasing BHS pastoral support / emerging community concerns are affecting education (eg attendance, behaviour, risky behaviours outside school, lower parental engagement). EH to be advised. BHS to lead.**

**Level 3 -** Children with multiple or complex needs including medium risk of CSE have to be met by
targeted services or by a multi-agency early help assessment or by other specialist assessments e.g. CSE Measurement Tool / Education Health Care Plan – **Other agencies are already involved. Significant concerns raised around the need for family support. Advise from CDT sought. EH/CIN likely. Startwell to lead.**

**Level 4 -** Are those children and young people who present with acute needs / risk. Including high level
CSE concerns / risk. They will require specialist Social Worker or multi-agency statutory response**. – BHS professional referral completed by DSL.**

**Early Help Pre-Assessment Questions**

The following questions are not exhaustive. If the student has any other emerging/existing needs that cannot be met by mainstream pastoral care, please specify the needs/concerns in box provided.

63

| Concern / Need | | Notes |
| --- | --- | --- |
| Sustained/Increased behavioural difficulties (e.g. regular WSD, repeated FTEs etc) / Displaying risky behaviours | | |
| Early signs of neglect / poor presentation over a sustained period | | |
| Low parental engagement/difficult to contact – negative impact on education | | |
| Parents have voiced they are struggling with managing their son/daughter's needs or behaviour or family situation – negative impact on education | | |
| Safeguarding concerns have recently been raised / previous concerns re-emerging | | |
| Involvement from outside agencies (e.g. CAMHS, TESS etc) | | |
| Other known vulnerabilities (e.g. FSM, EAL, SEND, MYA etc) in addition to other specified concerns | | |
| Disengaged from education / Declining school attendance (below 95%) | | |
| Mainstream pastoral support no longer sufficient to support student | | |
| Other (please specify) | | |

*Appendix Nine*
**Bedford High School: Home Visits Guidance**

All work with students and parents/carers should usually take place at the school or other agreed workplace. There are however, occasions where it is necessary to make one off or regular home visits. Under such circumstances, it is essential that appropriate policies and related risk assessments are adhered to in order to safeguard staff and students, who can be more vulnerable in these situations.

**Underpinning principles:**
  ➤ The welfare of the student is paramount. Staff should understand their responsibilities to safeguard and promote the welfare of all students.
  ➤ Staff must remain professional at all times. Staff are responsible for their own actions and should avoid any behaviour which would lead any responsible person to question their motivation and intentions.

To safeguard both students and staff, the following guidance must be adhered to when conducting home visits:
  ➤ Initial home visits must be conducted by a minimum of two members of staff**.**
  ➤ Initial home visits must be risk assessed to establish the appropriate levels of risk of subsequent visits. All risk assessments must be discussed with line managers and recorded on CPOMS.
  ➤ Only following discussions and agreement from line managers, should home visits be conducted by lone staff. Lone staff should only conduct home visits if the situation is deemed to be very low risk to the member of staff.
  ➤ Initial risk assessments should be seen as guidance and reviewed regularly.
  ➤ Staff must work in an open and transparent way and record the details of each home visit on CPOMS. Should any issues arise from the initial home visit risk assessment then this information should also be recorded on sims.
  ➤ Prior to conducting any home visit, staff must inform the attendance team.
  ➤ Staff must always follow our signing in/out procedures when conducting home visits.

  **Initial Home Visit Risk Assessment:**

| | |
|---|---|
| Parent / Carer / Responsible Adult not present | |
| Parent / Carer / Student displaying volatile behaviours and/or aggression | |
| Possible substance misuse evident | |
| ASB displayed by other residents / members of the community | |
| Dangerous dogs | |
| Reluctance to invite staff member into the address | |
| Evidence of criminal behaviour | |
| H&S risks (other) | |
| Known Social Care / Agency involvement | |
| Allegations made against staff / school | |

Signed:                                              Date: