



# GURUKULA

## Safeguarding and Child Protection Policy

Authority	Name	Approved Date	Next Review Date
<b>Designated Safeguarding Lead (DSL)/Head of Teaching and Learning</b>	Gwyneth Milan (Gunacuda Dasi)	February 2020	September 2020
Chair of Governors Safeguarding Link Governor	Mr Mohan Luthra Dorota Somerville	February 2020	September 2020
Headteacher /DSL	Gwyneth Milan (Gunacuda Dasi)	September 2020	September 2021
Governing Body	Members	September 2020	September 2021
Headteacher/DSL	Gwyneth Milan	September 2021	September 2022

## Child protection and Safeguarding Policy

\*\*\*The school follows the procedures established by the **Hertfordshire Safeguarding Children Partnership**; a guide to procedure and practice for all agencies in Hertfordshire working with children and their families.

Email: [admin.hscp@hertfordshire.gov.uk](mailto:admin.hscp@hertfordshire.gov.uk)

Website: <https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx>

Telephone number: 01992 588757

### Key Contacts

**Hertfordshire Children's Services Number: 0300 123 4043**

- First Response Service
- Private Fostering
- Disabled Children's Team
- Children in care Services

**Hertfordshire Safeguarding Children Partnership: 01992 588757**

**Hertfordshire Constabulary Police: 0845 339 9222**

**NSPCC Child Protection Helpline: 0808 800 5000**

**Child Line: 8088 11 11**

Call 999 if it is an **emergency**

### Introduction

The School is fully committed to providing the highest standards of pupil welfare and takes proactive steps to actively promote and safeguard all its children. This policy exists to establish the safest possible learning and working environments for all

All staff recognise that they have a full and active part to play in protecting our pupils from harm at all times. This policy aims to provide all members of staff (paid and unpaid), children and young people, and their families with a clear and secure framework for ensuring that all children in the school are protected from harm, both while at school and when not on the school premises.

### Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

### Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children board\*\*\*.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- Procedures put in place by the Hertfordshire Children's Safeguarding Partnership

<https://hertsscb.proceduresonline.com/>

**Practitioners who work with children at the Gurukula should read this policy within the framework of,**

- i. [KCSIE 2021 Update](#) Keeping children safe in education, Department of Education  
[Working Together to Safeguard Children](#) (2018) and [Changes to statutory guidance- Working Together to Safeguard Children](#) (2018)
- ii. Protecting children from radicalisation: the prevent duty 2015. Statutory [Revised Prevent Duty Guidance March 2016](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015
- iii. [Supervision of Activity with Children 2014](#)

- iv. LGfL Safeguarding Board guidance July 2016
- v. Use of reasonable force: Advice for Principals, staff and governing bodies [Use of Reasonable Force 2015 update](#)
- vi. [London Child Protection Procedures, 5th Edition \(2010\)](#);
- vii. [Safeguarding Children and Safer Recruitment in Education \(2010\)](#);
- viii. [Disqualification under the childcare act](#) (June 2015)
- ix. Teacher Misconduct [Information for teachers](#) (July 2016 update)
- x. [The Children Act 1989](#) (and [2004 amendment](#)),
- xi. [Multi Agency Statutory Guidance on FGM](#) (revised 2016), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- xii. [What to do if you are worried a child is being abused](#) 2015
- xiii. [Information Sharing](#) (March 2015)
- xiv. [Guidance-for-Safer-Working-Practices](#) (2019)

## 1) Definitions

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

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

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

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children. The Children’s Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of the children and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

The typical forms of abuse that people working with children and young people should be aware of are detailed in appendix 1

**We recognise that safeguarding is not just about protecting children from deliberate harm. It also relates to aspects of school life including:**

- ii. Pupils' health and safety
- iii. The use of reasonable force
- iv. Meeting the needs of children with medical conditions.
- v. Providing first aid
- vi. Educational visits
- vii. Intimate care
- viii. Internet or e-safety
- ix. Appropriate arrangements to ensure school security, taking into account the local context

As such this Child Protection and Safeguarding Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school. In particular, this policy links to the following policies and procedures

- Safer Recruitment Policy,
- Staff Code of Conduct Policy
- Online Safety Policy
- Public Interest Disclosure (Whistleblowing) Policy
- School Behaviour Management Policy
- Anti-Bullying & Cyber Bullying Policy
- Physical Intervention and Reasonable Force Policy,
- Complaints Procedure
- Health and Safety Policy including Site Security
- Sex & Relationships Education Policy
- First Aid Policy

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

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

## **2) 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.

Bullying including Cyberbullying	Hate	Radicalisation and Extremism
Child Sexual Exploitation	Information and	Relationship abuse
Children Missing from Home or Care	communication technology (ICT) – based forms of abuse	Self-harming and suicidal behaviour
Children Missing Education	Looked after children	Serious Violence
Criminal exploitation of children and vulnerable adults: county lines	Missing children and adults	Sexually active children
Domestic abuse	Mental Health	Sexually exploited children
Drugs	Not attending school	Sexting
Fabricated or induced illness	Parental lack of control	Sexual violence and sexual harassment between children in schools and colleges
Faith based abuse	Parental mental illness	Trafficking and exploited children-modern slavery
Female genital mutilation (FGM)	Parents with learning disabilities	Young carers
Forced Marriage	Parents who misuse substances	Spirit possession or witchcraft.
Gangs and youth violence	Peer on peer abuse	Upskirting
Gender based violence/violence against women and girls	Pregnancy	
Honour based violence	Private fostering	

As such, we are aware of a range of potential safeguarding issues that as professionals, we need to be vigilant of. Further detail of these areas is provided by information contained within documents listed at the beginning of this policy, in particular, [KCSIE Annex A](#) and in appendix 4. These include:

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

### 3) Statement of Principles: Assuring Good Practice: Keeping Children Safe

The School's procedures for safeguarding children will be in line with the **Hertfordshire Safeguarding Children Partnership Procedures** and "Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021.

#### **In order to ensure children are adequately protected, the school will:**

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to when they have a worry or concern.
- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and well-being of a child. **Please see appendix 5: Safer Working Practices.**
- Ensure that children, who have additional/unmet needs are supported appropriately. This could include referral to early help services or specialist services if they are a child in need or have been / are at risk of being abused and neglected
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Provide children with information so that they are aware of how to keep themselves safe including online safety, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. All children in the school should know of the national agencies such as Childline they can approach for advice if they do not feel able to talk to anyone they know.
  - The NSPCC Child Line: Tel 08001111 free 24-hour telephone service
  - National Society for the Prevention of Cruelty to Children Helpline: Tel: 0800 800500 free 24-hour telephone service
  - Children's Legal Centre Tel: 01206 873820
- Ensure staff members working with children are advised to maintain an attitude of "it could happen here" where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- Maintain clear procedures to identify and refer suspected cases of abuse, ensuring all staff are aware of and follow correct policy & procedure;
- Provide up-to-date safeguarding related training for all staff working with children;
  - Adopt appropriate recruitment and human resource procedures, including arrangements for checks on staff, agency staff, volunteers and learners working with young people. **See Appendix 2: Safer Recruitment**
- Ensure each parent/carer is made aware of the school's responsibilities regarding child protection procedures through publication of this policy, and reference to it on our website
- The names and photographs of the designated staff members will be clearly shown in the school and on the school's website with a statement explaining the school's role in referring and monitoring cases of suspected abuse or neglect.

## 4) Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures established by the **Hertfordshire Safeguarding Children Partnership**. Our policy and procedures also apply to extended school and off-site activities.

### 4.1 All staff

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

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

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff /code of conduct], the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- The **early help process** (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- 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. Appendix 1 and 4 of this policy outlines in more detail how staff are supported to do this.
- 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

All Staff will also

- Report suspicions or disclosure to the DSL or their Deputy, paying due regard to the context of any observations i.e. a relatively minor concern may take on greater significance within the wider context of knowledge of a child or family the DSL may not have.
- Report staff allegations as follows
  - Teacher to the DSL

- Non-teaching to DSL
- DSL to Chair of Governors
- Inform the DSL when they suspect or become aware that a pupil is subject to a private fostering arrangement
- Provide the DSL or their Deputy with relevant information in a detailed written format, as required.

#### **4.2 The Designated Safeguarding Lead (DSL)**

- The designated safeguarding lead (DSL) takes the lead responsibility for child protection, including support for other staff and information sharing with other agencies, developing policies and staff training.
- **Our DSL is Gwyneth Milan (Gunacuda Dasi)**
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- When the DSL is absent, the **deputy is Tanuja Shukla (Tulsi Seva Dasi)**.
- The DSL will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in their job description but include,

- To refer suspected abuse and neglect to the First Response Service;
- Report allegations made against members of staff to the Local Authority Designated Officer or LADO;
- Review and make recommendations to the Governors on this policy;
- Develop and update related school specific child protection/safeguarding policies, ensuring that staff, children/families/parents and carers are aware of them;
- Provide support and advice to all members of staff within the setting regarding child protection concerns;
- Ensure that a child protection file is copied for the new educational establishment when a child moves educational settings, and that this file is transferred securely and separately from the main pupil file;
- Ensure that staff receive appropriate child protection and safeguarding training, and maintain training records;
- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child

- Inform the local authority when they suspect or become aware that a child is subject to a private fostering arrangement
- Co-operate with any requests for information from the local authority, such as child protection training returns and self- evaluative forms for safeguarding and child protection, in compliance with the Section 11, Children Act 2004

#### 4.3 The governing board

. The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the head teacher to account for its implementation

- The governing body will appoint a senior board level/ 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. **The current link governor for safeguarding is Dorota Somerville (Gaurangi). Contact details are [gaura\\_ids@yahoo.com](mailto:gaura_ids@yahoo.com)**

- The Governing Body will ensure appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material in line with the guidance in Annex C of Keeping Children Safe in Education (DFE 2021) and in part by the risk assessment required by the Prevent Duty.

- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the DSL, where appropriate (see appendix 2) **The current chair of governors is Mr Mohan Luthra. Contact details are [mo@blandtobrand.co.uk](mailto:mo@blandtobrand.co.uk)**

In the absence of the Chair of Governors, the **Vice Chair should be contacted: he is Mr Kunal Kotecha (Kanchanabja) and his contact details are [kanchanabja.bcs@gmail.com](mailto:kanchanabja.bcs@gmail.com)**

#### 4.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable

## 5) Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools. The following principles apply but see also our Confidentiality Policy.

- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- Staff may have access to highly sensitive, confidential information about pupils and students. They should never use confidential or personal information about a student or her/his family for their own, or others' advantage. Information must never be used to intimidate, humiliate or embarrass the student.
- Confidential information about a student should never be used casually in conversation or shared with any person other than on a 'need to know basis'. In circumstances where the child's identity does not need to be disclosed, the information should be used anonymously.
- There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities. We follow the guidance set out in [Information Sharing](#) (March 2015) If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from a member of the Leadership Team.
- All media or legal enquiries should be passed to the DSL, who will seek advice. In addition staff/volunteers are made aware that if a child confides in a member of staff/volunteer and requests that the information is kept secret, they are to tell the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe. If the child then decides against telling the staff/volunteer about what is troubling them, staff/volunteers should try and encourage the child to speak to someone else they know and trust. If the child is uncomfortable with this, reassure him/her that you would be happy to see them another time
- On receipt of any information from parents or staff about suspected abuse, you must refer the matter to the Designated Teacher as a matter of urgency.
- As we are close knit community, we must guard against inappropriate conversations out of school with other members of the community outside of school regarding any aspect of children in our care. Both the children and adults have a right to confidentiality and any information should only be shared with designated persons.

***Confidentiality is also addressed in this policy with respect to record-keeping in section 10, and allegations of abuse against staff in appendix 3***

## 6) Recognising abuse and taking action

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

### 6.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.** Tell the DSL (see section 4.2) as soon as possible if you make a referral directly.

The following link to the GOV.UK webpage for reporting child abuse to the local council can be used <https://www.gov.uk/report-child-abuse-to-local-council> if making a direct referral

The local procedures for making a referral which be found at, <https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/professionals-and-volunteers/professionals-and-volunteers.aspx#>

### 6.2 If a child makes a disclosure to you: See also Appendix 6: Dealing with Disclosures

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words on the designated concern form (in purple file). Stick to the facts, and do not put your own judgement on it. Forms are located in the purple folders in each classroom
- Sign and date the form and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 6.1), and tell the DSL as soon as possible that you have done so.

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

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

**Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, **personally**. This is a **statutory duty**, and **teachers will face disciplinary sanctions** for failing to meet it. The duty above does not

apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. **Staff should not examine pupils.**

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

**Any member of staff** who suspects a pupil is *at risk* of FGM must speak to the DSL and follow our local safeguarding procedures.

Local safeguarding procedures can be found at,

<https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/professionals-and-volunteers/professionals-and-volunteers.aspx#>

#### **6.4 If you have concerns about a child (as opposed to a child being in immediate danger)**

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger

- a) Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below). You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.
- b) Make a **written record** as soon as possible after the event, using the designated forms in purple safeguarding files noting:
  - i. Name of child
  - ii. Date, time and place
  - iii. Who else was present?
  - iv. What was said/what happened/what you noticed: speech, behaviour, mood, drawings, games or appearance
  - v. If a child or parent spoke, record their words rather than your interpretation
  - vi. Analysis of what you observed and why it is a cause for concern.
- c) Following any concerns raised by staff, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. **The DSL may take advice from the Local Safeguarding children partnership.** If the DSL or deputy DSL is not available and there are immediate concerns, the staff member will take advice directly from children's social care. Subsequent action taken by the DSL will be dependent on this assessment and could be,
  - **EARLY HELP:** If **early help** is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. Families First is Hertfordshire's programme of early help services for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) and will help practitioners and families find information and support to prevent escalation of needs and crisis. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. **If a member of staff disagrees about the level of concern and feels that a child has**

not been protected, then any member of staff can make a direct referral to Children's Social Care at <https://www.gov.uk/report-child-abuse-to-local-council>. Staff can also call the local Consultation hub.

[http://www.thegrid.org.uk/info/welfare/child\\_protection/referral/consultation.shtml](http://www.thegrid.org.uk/info/welfare/child_protection/referral/consultation.shtml)

- I. **REFERRAL:** If it is appropriate to refer the case to the local authority children's social care or the police, the DSL will make the referral. **NOTE: If you make a referral directly (see section 6.1), you must tell the DSL as soon as possible.** The referral will note all previous intervention by the school with the child, any relevant history relating to the child, their siblings, or the family.

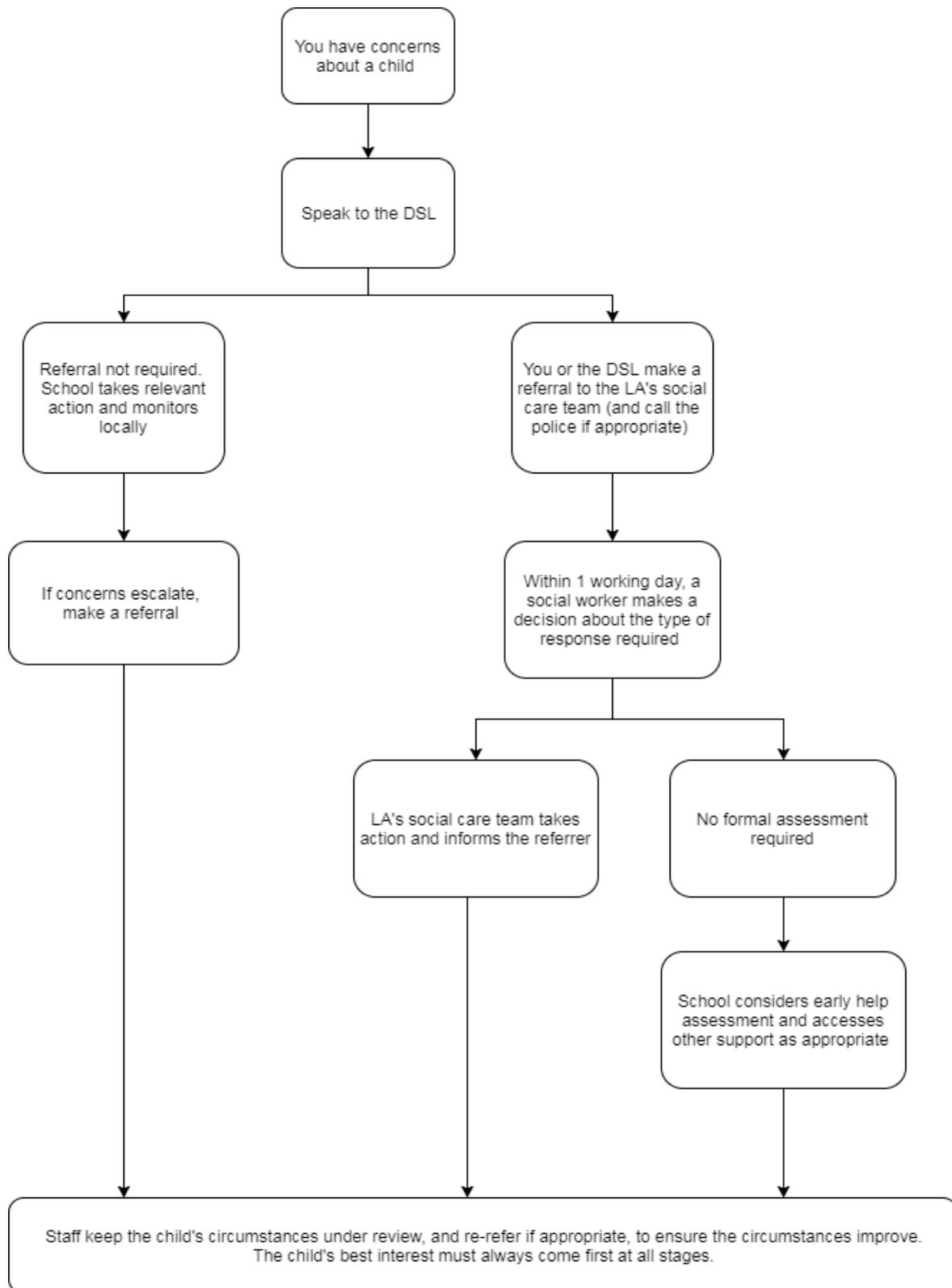
***N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police, although the DSL should also be made aware***

Following a referral,

- 1) **The DSL shares information with other relevant professionals,** recording reasons for sharing information and ensuring that they are aware of what action the other professionals will take as a result of the information shared.
- 2) **The DSL informs parent/carer that they have made a CP referral,** if the parent/carer does not already know, and if there is no reason not to let them know.
  - i. *The local Safeguarding Children Partnership may suggest delaying informing the parent/carer in cases of suspected sexual abuse, or where informing the parent might put the child at further risk, to prevent the child being harmed or intimidated (and retracting the disclosure).*
  - ii. *In cases of suspected Fabricated or induced illness by proxy, the parent/carer is not informed that this is being considered.*
- 3) **The DSL remains in close communication with other professionals around the child/young person and with the family, in order to share any updates about the child/young person.** The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. **If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.**
- 4) If a child protection investigation is pursued, the DSL and other key school staff will:
  - i. *Work closely and collaboratively with all professionals involved in the investigation, to keep the child/young person safe;*
  - ii. *Attend a child protection conference when invited and provide updated information about the child;*
  - iii. *Attend any subsequent child protection review conferences;*

- iv. Attend core group meetings and take an active role in the implementation of the protection plan

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



### 6.5 If you have concerns about extremism

- If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).
- 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**, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.
- **In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:**
  - Think someone is in immediate danger
  - Think someone may be planning to travel to join an extremist group
  - See or hear something that may be terrorist-related

### 6.6 If you have a mental health concern

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 6.4.

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

Staff should refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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

#### *See also Appendix 3*

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

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

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

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

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

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

### **6.8 Allegations of abuse made against other pupils: Peer on Peer Abuse**

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

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

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

#### **Procedures for dealing with allegations of peer-on –peer abuse.**

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

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – 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 pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

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

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

### Your responsibilities when responding to an incident

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

### Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

### Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

### Informing parents/carers

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

### Referring to the police

If it is necessary to refer an incident to the police, this will be done through a police community support officer.

### Recording incidents

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

### Curriculum coverage

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

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

- The receipt of such images

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

## 7) Notifying Parents

- Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.
- **Other staff will only talk to parents about any such concerns following consultation with the DSL.**
- If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so
- In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved

### Pupils with special educational needs, disabilities or health issues

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

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

We offer extra pastoral support for these pupils. This includes: one to one talk sessions with our SENDco, counselling sessions with external agencies.

### Pupils with a social worker

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

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

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

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

- The provision of pastoral and/or academic support

### 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 children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

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

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

## 8) Mobile phones and cameras

- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. All staff must lock their devices away or put them out of sight in the classroom.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras. Each class has an IPAD and cameras for photos. Personal phones or cameras should not be used for school photos.
- We will follow the Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

## The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scam. **To meet our aims and address the risks above we will:**
- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

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

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website [www.gurukula.org.uk](http://www.gurukula.org.uk)

## 9) Complaints and Concerns about School Safeguarding Practices

### 9.1 Complaints against staff

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

### 9.2 Other complaints

For complaints or concerns around safeguarding or any other issues please refer to the school's Procedure for Complaints.

### 9.3 Whistle-blowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of the senior leadership team and/or relevant external agencies. This is particularly important where the welfare of children may be at risk. Staff should be familiar with the **Public Interest Disclosure (Whistleblowing) Policy and Procedures**. Where internal reporting arrangements are viewed not to have been taken seriously or with sufficient rigour, any member of staff can raise concerns externally if the matter is not resolved by the DSL or Chair of Governors e.g., via the Local Authority's Designated Officer for Managing Allegations; the local safeguarding partnership or the Government's Whistle-blowing report line: **0800 028 0285**

## 10) Record-keeping

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

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

Records will include:

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

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

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

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

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

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

- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be transported securely, either via direct hand out or registered post to the chosen secondary school.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff
- Paper records are kept in a secure locked filing cabinet that only the DSL and Deputy DSL have access to.
- The information on each child will be passed to their next school and will also be retained by the school until the child is 21

- The information is confidential and will only be shared with the relevant agencies as appropriate
- All records are kept as paper (hard) copies and are kept in a locked filing cabinet in the school office which only the headteacher and DSL have access to.

### Where are records held?

- All records are locked and kept securely and when a child transfers to a new school the DSL will personally take the records to the ongoing setting and hand over the records. The DSL will get a signature from the new school that the records have been received. If for some reason this is not possible then the confidential records will be sent by secure mail service requiring a signature upon receipt. A phone conversation will follow to ensure and confirm receipt of documents.
- Records will only be shared with staff on a need-to-know basis and with social services. Otherwise, the records will be kept strictly confidential.
- Information may be shared generally with the ISKCON CPO but not specific records. Information will be shared with other professional agencies on a need-to-know basis like Social services, Doctor, educational psychologist.

## 11) Training

### 11.1 All staff

- All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children partnership.
- All adults, (including supply teachers and volunteers) new to our school will be made aware of the name and contact details of the DSL and have their role explained as part of their induction into the school. All new staff at the school (including volunteers and supply staff) will receive a copy of this policy, the staff code of conduct and KCSIE Part 1, along with our basic child protection/safer working practices information leaflet prior to taking up post or on the first day of starting work at the school. They will then within the first half term/first week receive in- house training (Level 1) from the DSL.
- Each member of staff will receive external training as arranged by the DSL to develop their understanding of the signs and indicators of abuse or neglect every three years. This will include specific safeguarding issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals. This is generally arranged through the NSPCC.
- All staff will have internal training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

- Volunteers will receive appropriate training, if applicable.

### **11.2 The DSL and Deputy DSL**

The DSL and Deputy DSL will undertake child protection and safeguarding training at least every 2 years. They will also undertake Prevent awareness training.

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

- 1. Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments*
- 2. Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so*
- 3. Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children*

### **11.3 Governors**

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

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

### **11.4 Recruitment – interview/appointment panels**

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

### **Staff who have contact with pupils and families**

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

### **11.5 Children – Network Hands**

Every year in the first half term the children undertake a study of safeguarding which includes all aspects of safety i.e., e-safety, PANTS etc. This promotes healthy and informative

discussion of the topic, and this is revisited each term to ensure that the children have understood. The training includes our school practice of Network Hands which is displayed in each classroom. It helps the children to identify 5 people that are in their immediate circle that they can go and tell if they do not feel safe or have some concerns. We also receive visits from the local police, fire fighters and NSPCC (once every 2 years).

## 12) Safer working practice: See also Appendix 5

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook/ code of conduct and Safer Recruitment Consortium Document ***Guidance for safer working practice for those working with children and young people in education settings (September 2015)*** available at [http://www.thegrid.org.uk/info/welfare/child\\_protection/allegations/safe.shtml](http://www.thegrid.org.uk/info/welfare/child_protection/allegations/safe.shtml)

## 13) Monitoring arrangements

This policy will be reviewed **annually** by the Governing Body. At every review, it will be approved by the full governing board.

Compliance with the policy will be monitored by the link governors for safeguarding.

## Appendixes

These appendixes 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 cyberbullying), 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**

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 and as set out in greater detail in our Safer Recruitment Policy.

### **Appointing new staff**

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

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

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

## Seeking references and checking employment history

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

When seeking references, we will:

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

## Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

## Pre-appointment vetting checks

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

## New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

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

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e., that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)

- If 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 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.
- At all pre-contract meetings for major works during school time Safeguarding will be highlighted as a key issue.
- Any work carried out in school during the school day will be closely supervised and designated areas will restrict the movement of any contractors to ensure that there is no contact with pupils.
- School will not endorse or distribute leaflets/flyers for private individuals or commercial companies.

### 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.

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

## 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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, will be given the same consideration as paid staff.

Where a parent or other volunteer helps on a one-off basis, he/she will only work under the direct supervision of a member of staff, and at no time have one to one contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period then they will be checked to ensure their suitability to work with children and will go through an induction process which includes reference to the school's safeguarding policies and procedures

If members of staff wish to bring external people in to assist with activities, they must first gain permission from the DSL

## 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.

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

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

- Section 128 direction
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

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

All proprietors, trustees, local governors and members will also have the following checks: A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

### Adults who supervise pupils on work experience

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

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

### Pupils staying with host families

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

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

## Appendix 3: Allegations of Abuse made against Staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

### Suspension

Suspension 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 it 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 have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the organisation

### 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
- **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)

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the DSL (or chair of governors where the DSL is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Ensure that the child reporting the allegation is safe and away from the member of staff against whom the allegation has been made
- Immediately 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
- **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 consider 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 and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 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
- Any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the school. We recognise our legal duty to refer to the DBS and any other relevant professional body details of anyone who has harmed or 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 National College for Teaching and Leadership. Where the police are involved, wherever possible the governing body 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 will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this 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 case manager and the school's personnel adviser will discuss with the designated officer whether to 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 case manager and personnel adviser will discuss with the designated officer 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 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 local authority's designated officer, 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. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these 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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Learning lessons

After any cases where the allegations are *substantiated*, we 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

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

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 staff code of conduct.

Staff may refer to the following for guidance: [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)]

### 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

Further detail of these areas is provided by information contained within documents listed at the beginning of this policy, in particular, [KCSIE Annex A](#)

### Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. The internet and use of social media have become major factors in the radicalisation of young people. Our school's E-safety policy and curriculum embeds understanding of these particular risks using departmental guidance from [Use of Social Media for Online Radicalisation \(2015\)](#) to support this.

The Counter-Terrorism and Security Act 2015 places a duty on schools (and other specified authorities) to have due regard to the need to prevent people from being drawn into terrorism. Radicalisation is usually a process not an event – It is possible to intervene to prevent vulnerable people being drawn into terrorism. Vulnerable individuals identified as being at risk of radicalisation are referred to the **Channel programme\*\***. This is a multi-agency panel that provides support to the individual through specialised intervention providers. Whilst the risk of radicalisation is remote it is still a possibility to consider when assessing behavioural changes. If any staff member has any concerns about any child/family at risk of radicalisation or if that member sees a change in behaviour/dress which is not normal, they will complete a cause of concern form and pass this to the DSO who will then submit a referral to the Prevent Institutions Officer and/or the Local Authority Social Care Team.

All staff members will have PREVENT training. Paragraphs 57-76 of the [Revised Prevent Duty guidance: for England and Wales](#) are specifically concerned with schools (but also cover childcare). There is separate guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil.

You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

### **\*\*Channel Programme**

School and college staff should understand when it is appropriate to make a referral to the Channel programme. Guidance is available at: [Channel guidance](#). E learning channel awareness programme for staff is available at: [Channel General Awareness](#). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. Advice regarding **PREVENT** or referrals to the Channel programme can be obtained from the Prevent team on 02089012690

### **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. CSE does not always involve physical contact and can happen online.

#### **Further Information on child sexual exploitation**

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late;
- and Children who regularly miss school or education or do not take part in education.

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.

### **So-called 'honour-based' violence (HBV)**

So called 'honour-based' violence encompasses crimes which have been committed to protect or defend honour of the family and/or the community, including Female Genital Mutilation, forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in

any doubt, staff should speak to the DSL. Professionals and all staff need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### **Indicators**

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place here are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the [Multi-agency guidelines: Handling case of forced marriage](#).

### **Actions**

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison

with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see FGM section).

### **Female Genital Mutilation (FGM)**

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for nonmedical reasons. It's also known as female circumcision. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. There is a mandatory requirement on healthcare professionals, social workers and teachers to report cases of FGM in girls under 18 years of age. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#). The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#). All staff at will receive updated information and this will be included in the annual safeguarding training.

**Any teacher who discovers that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty; teachers will face disciplinary sanctions for failing to meet it.**

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

**Any member of staff who suspects a pupil is *at risk* of FGM must speak to the DSO who will follow our local safeguarding procedures.**

### **Upskirting**

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual

gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence under the Voyeurism Act 2019.

### Serious Violence

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

### Children Missing Education (CME) or Missing from Home and Care

Our School policy is set out in a separate document. A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. 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*
- *Come from Gypsy, Roma, or Traveller families*
- *Come from the families of service personnel*
- *Go missing or run away from home or car*
- *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 in immediate danger or at risk of harm.

[The Education \(Pupil Registration\) Regulations 2006](#) sets out the circumstances in which a school/academy can remove a child from roll. If a pupil leaves the provision without forwarding details being provided the home Local Authority will be notified and police and social care may be alerted. Where a pupil is missing for 5 days without justifiable cause and whereabouts is unknown a referral will be made to the home local authority where the pupil resides. The School has adopted guidelines as outlined in Annex A of Keeping Children Safe in education and Children Missing Education (2016)

### Private Fostering.

We recognise the importance of identifying children in Private Fostering arrangements so that their needs can be fully assessed by the local authority. At this school we will confirm the status of every pupil's care arrangements on admission (or when a pupil's care arrangements change) and notify the local authority of any known or suspected Private Fostering arrangement. We will support any subsequent assessment and remain alert to any additional needs that children placed away from their immediate families might face. Click here for information on what constitutes [private fostering](#) and here for details of [The Children's Act 1989: private fostering](#).

### Bullying & Cyber Bullying

Our school's policy on the prevention and management of bullying is set out in a separate document and is reviewed annually by the governing body. This policy includes reference to all prejudice related bullying. We acknowledge that to allow or condone bullying may lead to consideration under child protection procedures. See further [government guidance on bullying](#).

### Children with Disabilities or Special Educational Needs

Our school is committed to ensuring that children with disabilities or special educational needs have exactly the same human rights to be safe from abuse and neglect, to be protected from harm and achieve the same outcomes as non-disabled children. We recognise that disabled children do however require additional action because they can experience greater vulnerability as a result of negative attitudes and because they may have additional needs relating to physical, sensory, cognitive and/or communication impairments. In particular, we are aware that these additional barriers can include:

- *Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration;*
- *Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs;*
- *Communication barriers and difficulties*
- *Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)*
- *Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.*
- *A disabled child's understanding of abuse.*
- *Lack of choice/participation*
- *Isolation*

This understanding is incorporated into our staff training, so that we all remain vigilant to identifying the additional vulnerabilities for these children in our care.

## Trafficking

Our school will remain alert for children trafficked into the country who may be registered at our school for a term or longer, before being moved to another part of the UK or abroad. We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, Traveller or migrant families – who collectively go missing from school. For further government guidance refer to [Safeguarding Children who may have been trafficked practice guidance](#).

## Domestic Abuse

Our school recognises the immediate and long-term impact of domestic abuse on a child's development and emotional wellbeing. All staff will remain vigilant to identifying the signs so that early help and protective action can be instigated where appropriate. We endeavour to provide the child with a safe and caring environment at school to help mitigate the impact of home-life stresses.

All notifications of domestic abuse will be managed in accordance with [government guidance on domestic violence and abuse reporting](#).

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.

## Homelessness

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

The DSL and deputy 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.

## Online Safety

Our school policy is set out in a separate document. We ensure that online safety is included in the curriculum at all levels and that information is also provided to parents/carers. Using the guidance <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>, all staff are made aware of the school policy on online safety which sets our expectations relating to:

- *Creating a safer online environment;*
- *Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;*
- *Inspiring safe and responsible use and behaviour;*
- *Safe use of mobile phones both within school and on school trips/outings;*

- *Safe use of camera equipment, including camera phones;*
- *What steps to take if you have concerns and where to go for help*

The guidance includes the following underpinning knowledge and behaviours:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Online behaviour
- How to identify online risks
- How and when to seek support

Potential Harms covered in the guidance, which will be taught, includes:

- Age restrictions
- Content: How it can be used and shared
- Disinformation, misinformation and hoaxes
- Fake websites and scam emails
- Fraud (online)
- Password phishing
- Personal data
- Persuasive design which keeps 'users online for longer than they might have planned or desired'
- Privacy settings
- Targeting of online content
- Abuse (online)
- Challenges [to do something and post about it]
- Content which incites...hate, violence
- Fake profiles
- Grooming
- Live streaming
- Pornography
- Unsafe communication
- Impact on confidence (including body confidence)
- Impact on quality of life, physical and mental health and relationships
- Online vs. offline behaviours
- Reputational damage
- Suicide, self-harm and eating disorders

The Teaching online safety in school guidance emphasises the need for a whole school approach so that it is embedded in everything our school does including:

- Creating a culture that incorporates the principles of online safety across all elements of school life
- Proactively engaging staff, pupils and parents/carers
- Reviewing and maintaining the online safety principles
- Embedding the online safety principles
- Modelling the online safety principles consistently

### Looked After and Previously Looked After Children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Governing Body will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children (and previously looked after children) safe. In particular, they will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. See statutory guidance at

[The designated teacher for looked after and previously looked after pupils 2018](#)

### Gangs and Youth Violence

Schools are increasingly recognised as places where early warning signs can be spotted that younger children may be at risk of getting involved in gangs or youth violence. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched. We recognise that even low levels of youth violence can have a disproportionate impact on a pupil or the wider school/community environment. We will therefore, support children in developing safeguarding skills to prevent involvement in risky behaviours, and where serious concerns arise, we will work collaboratively with our partner agencies to help prevent escalation of harm. For further information refer to government guidance on [advice to schools on gangs and youth violence](#).

### 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. A lack of consent can be where a person does not consent or where they cannot consent e.g. if they have learning disabilities. There can also be links to Honour Based Violence.

Our school recognises that it has an important role in safeguarding children from forced marriage by educating pupils about the law and their rights and in identifying signs of risk. 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. The Forced Marriage Unit has published [multi-agency statutory guidance](#) with pages 32-36 focusing on the role of schools and colleges. The Unit can be contacted for advice or information on 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

### Peer-on-peer abuse

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude 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 pupil 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.

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

### Non-collection of children

If a child is not collected at the end of the session/day, we will:

- After 15 min we will call the parent if we have not heard from them
- Class teacher will supervise the child and record late pick up as a concern
- If the parent has given permission for another parent to collect the child then we will honour that
- If a parent is late more than 3 times in a month, we will give a verbal warning
- If there is a consistent pattern of late collection, we will express this as a concern to parents
- If a child is not collected, we will immediately refer to Social services

### Missing pupils

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

- When registers are collected daily, we will contact any parents who have not rung in to the office to ascertain the reason for absence
- If we are not able to contact the parent and there has been no communication as to why the child is in school then we will contact Social services, especially if there has been a history of concern for the child

### Visitors

- I. The main / cottage building door is locked from the inside during the school day.
- II. The outside gates in the KS1/Reception Area and Year 3-6 Area is locked from the inside during the school day.
- III. For deliveries - all visitors will report to the School Reception (via the main / cottage building).
- IV. Any visitor to the school must first visit the School Office to sign in and get a visitor badge and on leaving they must sign out.
- V. Any member of the public who is not cooperating with boundaries set out by the school will be reported to the DSL.

## Appendix 5: Safer Working Practices: Staff Guidance

### See also

[http://www.thegrid.org.uk/info/welfare/child\\_protection/documents/guidance\\_for\\_safer\\_working\\_practice\\_october\\_2015.pdf](http://www.thegrid.org.uk/info/welfare/child_protection/documents/guidance_for_safer_working_practice_october_2015.pdf)

[www.safeguardingschools.co.uk/guidance-for-safer-working-practice-for-adults-who-work-with-children-and-young-people-in-education-2019/](http://www.safeguardingschools.co.uk/guidance-for-safer-working-practice-for-adults-who-work-with-children-and-young-people-in-education-2019/)

The school has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. At all times, members of staff are required to work in a professional way with children. All staff are made aware of the dangers inherent in:

- i. working alone with a child
- ii. physical interventions
- iii. giving to and receiving gifts from children and parents
- iv. contacting children through private telephones (including texting), e-mail, MSN, or social networking websites.
- v. disclosing personal details inappropriately
- vi. meeting pupils outside school hours or school duties

The staff Code of Conduct forms part of our School's compulsory training for all staff and volunteers. Click here for further [Guidance for Safer Working Practices 2015](#). In addition, we have a Safer Working Practices leaflet that is distributed to all staff, volunteers, students

### Duty of Care

All staff have a duty to keep pupils and students safe and to protect them from physical and emotional harm. Any concerns about a student, no matter how trivial they may seem, should be reported to a senior member of staff. Under the Health & Safety at Work Act 1974, all employees have a duty to take care of themselves and anyone else who may be affected by their actions or failings. All staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect pupils and students from discrimination and avoidable harm. **If members of staff wish to bring external people in to assist with activities, they must first gain permission from the DSL.**

### Exercise of Professional Judgement

This policy highlights behaviour that is illegal, inappropriate or inadvisable. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and in so doing, will be seen to be acting reasonably.

The School ensures that concerns pertaining to any of the above will be addressed according to the related Local Authority Safeguarding procedure.

Adults should not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care; or make audio recordings of a child's disclosure

### **Power and positions of trust**

All school staff are in positions of trust in relation to the pupils and students in our care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Staff have a responsibility to ensure that their position is not used for personal advantage or gratification. Wherever possible, staff should avoid behaviour, which might be misinterpreted by others, and report and record any incident with this potential.

### **Propriety and behaviour**

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of our pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and students and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting.

### **Dress and appearance**

A person's dress and appearance are matters of personal choice and self-expression. Staff should consider their professional role and ensure they are dressed decently, safely and appropriately for the tasks they undertake.

### **Gifts**

Staff need to take care not to accept any gift that might be construed as a bribe or lead the giver to expect preferential treatment. It is acceptable for pupils or parents/carers to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you but it is unacceptable to receive gifts regularly or of significant value. Similarly, it is inadvisable to give such personal gifts to pupils and students. This could be misinterpreted as a gesture either to bribe, or single out the student. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil must be consistent with the Behaviour for Learning Policy.

### **Infatuations**

Staff need to be aware that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop an infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

A member of staff, who becomes aware that a student may be infatuated with himself/herself or a colleague, should discuss this with a member of the Senior Leadership Team at the earliest opportunity, so that appropriate action can be taken.

### **Social Contact**

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. Where a pupil seeks to

establish social contact, or this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued.

Staff should not give their personal details such as home/mobile phone number; home or email address to pupils unless the need to do so and it is agreed with a member of the Senior Leadership Team.

Adults should turn off 3G/4G data access on school premises.

## Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. It is not possible to specify the circumstances where physical contact is appropriate and therefore staff should use their professional judgement at all times. Physical contact, which occurs regularly with an individual student is likely to raise questions unless the justification for this is part of a formally agreed care plan (for example in relation to pupils with SEN or physical disabilities). Where feasible, staff should seek the pupil's permission before initiating contact. Staff should listen, observe and take note of the pupil's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to him/her for the minimum time necessary

The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each pupil. Pupils with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the pupils needs, consistently applied and open to scrutiny.

Extra caution may be required where it is known that a pupil has suffered previous abuse or neglect. The student may associate physical contact with such experiences and this could lead to staff being vulnerable to allegations of abuse. It is recognised that many such children are extremely needy and can seek out inappropriate physical contact. In such circumstances staff should deter the pupil sensitively by helping them to understand the importance of personal boundaries. For further information, staff should refer to the **Reasonable Force and Physical Intervention Policy**.

### *i. Physical Education and other activities which require physical contact*

Some staff, for example, those who teach PE and dance, or who offer music tuition will on occasions have to initiate physical contact with pupils. This may be in order to support a pupil in performing a task safely, or to demonstrate the use of equipment/instrument or assist them with an exercise. This should be done with the child's agreement.

In these circumstances, contact should take place in an open environment and be for the minimum time necessary to complete the activity.

Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

### *ii. Pupils and students in distress*

There may be occasions when a distressed pupil needs comfort and reassurance which may require physical contact this must be appropriate to the age of the pupil involved.

Staff should remain self-aware at all times to ensure that their contact is not threatening, intrusive or subject to misinterpretation.

Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior member of staff.

### *iii. Showers and changing*

Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision to safeguard the health and safety of pupils and students and to prevent any incidents of bullying or teasing. This supervision should be appropriate to the needs and age of the pupils' concerned and staff need to be vigilant and sensitive to avoid any situations which may cause embarrassment

## **Behaviour management**

All pupils have a right to be treated with respect and dignity. All staff should be familiar with the **Behaviour Management Policy**. Staff should not use any form of degrading treatment to punish a student. The use of sarcasm, demeaning or insensitive comments towards pupils and students is not acceptable in any situation

## **Care, Control and Physical Intervention**

Section 4 of the 1996 Education Act allows staff to legitimately intervene in order to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline, having due regard to the health and safety of themselves and others.

Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. Our school's policy on **Physical Intervention and Positive Handling** by staff is set out separately. It complies with the DfE [Use of Reasonable Force 2013](#) (updated 2015)

## **Sexual contact with young people**

Any sexual behaviour by a member of staff with or towards a pupil is both unacceptable and illegal. Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the student consents or not.

The sexual activity referred to does not just involve physical contact. It may also be verbal or include non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material.

Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process (where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place). Grooming is a criminal offence.

## **One to One Situations**

Staff working in one to one situations with pupils may be more vulnerable to allegations and therefore it is important that such meetings are planned and conducted accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and pupils are met. Pre-arranged meetings with pupils away from the school premises should not be

permitted unless approval is obtained from their parent/guardian/carer and the DSL or other senior colleague with delegated authority

### Transporting pupils and students

In certain situations, e.g. out of school activities, staff or volunteers may agree to transport children. A designated member of staff should be appointed to plan and provide oversight of all transporting arrangements and respond to any difficulties that may arise. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded

### Educational visits and after school clubs etc.

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity.

A more relaxed discipline or informal dress and language code may be acceptable for activities which take place off the School site or out of school hours. However, staff remain in a position of trust and need to ensure that their behaviour is appropriate and that it cannot be misconstrued in anyway.

Residential activities need to be carefully considered and special attention needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. All staff are expected to follow the **Health and Safety Policy** guidance with respect to assessing risks.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity.

Staff responsible for organising educational visits should be familiar with the Department for Education's advice on Health and Safety (updated November 2018) available at <https://www.gov.uk/government/publications/health-and-safety-advice-for-schools/responsibilities-and-duties-for-schools>

School trips and outdoor learning activities

(HSE) <http://www.hse.gov.uk/services/education/school-trips.pdf>

### Confidentiality

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

### First Aid and Administration of Medication

The school has trained First-Aiders. Teachers and support staff may volunteer to undertake this task but it is not a contractual requirement. Staff will receive appropriate training before administering first aid or medication.

Pupils may need medication during school hours. In circumstances where children need medication regularly, a health care plan will be drawn up to ensure the safety and protection of pupils and staff. With the permission of parents and if appropriate, the children should be encouraged to administer the medication themselves.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil, this should be discussed with the appropriate senior colleague at the earliest opportunity. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents/carers should always be informed when first aid has been administered. Staff should refer to the **First Aid Policy**

### Intimate Care

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan will be drawn up and agreed with parents/carers for all children who require intimate care on a regular basis.

Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

Additional vulnerabilities that may arise from a physical disability or learning difficulty should be considered with regard to individual teaching and care plans for each child. As with all arrangements for intimate care needs, agreements between the child, their parents/carers and the school must be negotiated, agreed and recorded. In addition, the views and/or emotional responses of children with special educational needs, regardless of age and ability must be actively sought in regular reviews of these arrangements.

### Curriculum

Through personal and social education and education for citizenship, we can help to encourage children to develop realistic attitudes towards adult life. There is potential for teaching children and young people with a view to preventing abuse taking place and/or continuing. As with road, fire and water safety and protection from bullying, all children and young people have a right to the education as it is impossible to predict those individuals at risk.

If education PSE is to succeed in achieving its aim of behavioural change, then it needs to address attitudes and identify the skills, knowledge and understanding which most pupils and young people could be expected to acquire by the end of a Key stage 2 or as they move into their teenage years. Included in these courses should be the contact numbers of agencies that children and young people can turn to as specified above.

Care should be taken to comply with the setting's policy on spiritual, moral, social, cultural (SMSC) [education] which should promote fundamental British values and be rigorously reviewed to ensure it is lawful and consistently applied. Staff should also comply at all times with the policy for relationships and sex education (RSE).

### Sex and Relationship Education

Gurukula has a Relationship education policy which includes sex education in the curriculum (see separate policy). In addition, many topics are discussed during our annual safety week

where the children are visited by the residing Child Protection Officers who deliver a talk on personal sexual safety age appropriately. For KS2 children, a separate single sex education session is arranged in the summer term of their graduating year. We also discuss with them issues that may arise in the greater community including Female Genital Mutilation, Child sexual exploitation and forced young marriages.

Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to the pupil's questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff.

Care should also be taken to abide by the Sex and Relationships policy and the wishes of parents/carers. Parents/carers have the right to withdraw their children from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the science curriculum

### **Photography, Videos and other Creative Arts**

Many school activities may involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement.

Staff need to be aware of the potential for these aspects of teaching to be misused for pornographic or 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. Particular regard needs to be given when they involve young or vulnerable pupils and students who may be unable to question why or how the activities are taking place. Children who have been previously abused in this way may feel threatened by the use of photography and filming in the teaching environment.

Staff should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Using images of children for publicity purposes will require the age - appropriate consent of the individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.

### **Internet Use**

Under no circumstances should adults in school access inappropriate images. Accessing child pornography or indecent images of children on the Internet and making, storing or disseminating such material, is illegal and, if proven, will invariably lead to the individual being barred from work with children and young people.

Using school equipment to access inappropriate or indecent material, including adult pornography, is strictly forbidden and would lead to Disciplinary action. Staff should refer to the E-Safety Policy.

### **Sharing Concerns and Recording Incidents**

Staff who are the subject of allegations are advised to contact their professional association. In the event of an incident occurring, which may result in an action being misinterpreted

and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded on the “Safeguarding the welfare of staff” form and reported to senior staff. Early discussion with a parent or carer could avoid any misunderstanding. Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils and students so that appropriate support can be provided or action can be taken

### Alternative Provision

Where a pupil is placed with an alternative provision provider, we recognize that we continue to be responsible for the safeguarding of that pupil and as such we will ensure that the provider meets the needs of the pupil. We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff

## Appendix 6: Dealing with Disclosures

- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- All staff should know who the DSL is and who to approach if the DSL is unavailable.
- Ultimately, all staff have **the right to make a referral to the police or social care directly** and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

When a pupil makes a direct disclosure or implies that they have been abused the guiding principle of the ‘seven R’s’ should be followed

### Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

### Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don’t make promises you may not be able to keep e.g. ‘I’ll stay with you’ or ‘everything will be alright now’ or ‘I’ll keep this confidential’
- Do reassure e.g. you could say: ‘I believe you’, ‘I am glad you came to me’, ‘I am sorry this has happened’, ‘We are going to do something together to get help’

## Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

## Report

- Share concerns with the designated safeguarding lead as soon as possible
- If you are not able to contact your designated safeguarding lead, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

## Record

- If possible, make some very brief notes at the time, and write them up as soon as possible and pass to the DSL/Deputy DSL without delay
- Keep your original notes on file
- Record the date, time, place, person's present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

## Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Follow the school's and local authority's child protection procedures. Where there is doubt, consultation with the Child Protection Officer in the authority can be helpful.
- Try to get some support for yourself if you need it

## Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Inform the person that made the referral of any outcomes/actions
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training/ support required?

- The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information, they should be proactive in seeking it out.

## Appendix 7: Recording/Reporting Forms

### Record of Concern Form

Child's Name:			
Child's DOB:			
Male/Female:	Ethnic Origin:	Disability Y/N:	Religion:
Date and time of concern:			
Your account of the concern: (what was said, observed, reported and by whom)			
Additional information: (your opinion, context of concern/disclosure)			
Your response: (what did you do/say following the concern)			
Your name:			
Your signature:			
Your position in school:			
Date and time of this recording			
Action and response of DSO/Deputy or other: Please specify			
Name:		Date:	

## Parent Acknowledgement Form

The School has a Child Protection and Safeguarding Policy which means that staff will do everything they can to make sure that all the children in the school are free from harm, either in school or when the children are away from school.

To help staff keep your child safe, every member of staff must have training in child protection on a yearly basis, and the school has a Designated Safeguarding Lead (DSL) and a Deputy DSL who looks into any worries about children in school, and who looks out for children who are thought to be at risk.

The school will inform the local authority if there are any significant reasons to be worried about your child's wellbeing. The school may become worried about a child if they notice behaviour and mood changes, physical marks, worrying play or social behaviours, or if a family member of a child says something that makes the school think the child might be at risk of harm.

***The school will usually inform you that they are making a child protection referral, but they are not required to tell you, nor do they need your consent to make a referral***

**Name of Child: Child's Date of Birth:**

**Name of Parent/Carer (1):**

**Relationship to Child:**

I have read the School's Child Protection Policy and I understand the actions that might be taken if there are any cause for concerns about my child.

**Signature:**

**Date:**

**Name of Parent/Carer (2):**

**Relationship to Child:**

I have read the School's Child Protection Policy and I understand the actions that might be taken if there are any cause for concerns about my child.

**Signature:**

**Date:**

**DECLARATION FOR STAFF**  
**Safeguarding & Child Protection Policy and Keeping Children Safe in Education**

**DECLARATION FOR STAFF**

**Safeguarding Policy and Keeping Children Safe in Education**

**(DfE 2021)**

**Gurukula Academic Year 2021/22**

Please sign and return to Gwyneth Milan (Gunacuda) (DSL)

I, \_\_\_\_\_ have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these documents:

- 1) Gurukula Safeguarding Policy
- 2) Part 1 and Annex A of 'Keeping Children Safe in Education' DfE Guidance 2021

- I am aware that the Safeguarding team members are:  
**Tanuja Shukla and Gwyneth Milan**
- I understand that it is my duty to report any safeguarding concerns to any member of the Safeguarding team.
- I feel able to discuss any concerns I may have with them.
- I feel confident using a Record of Concern proforma to log concerns.
- I know that further guidance, together with copies of the policies mentioned above, are available via e-mail. Paper copies are available in the school office.

**Signed:** \_\_\_\_\_

**Role in school:** \_\_\_\_\_

**Date:** \_\_\_\_\_