



**Safeguarding Policy (Child Protection) (7a)  
(Whole School including EYFS)**

<b>Page Number</b>	<b>Heading</b>
	<b>SECTION 1</b>
Page 2	Rationale
Page 3	Aims
Page 4	School procedures
Page 5	Designated people
Page 5	Role of the Designated Safeguarding Lead
Page 7	Role of staff
Page 8	Role of the governors
Page 10	School contact details Local authority contact details
Page 11	Staff training
Page 12	General procedures
Page 13	Safeguarding concerns about a child
Page 16	Children suffering significant harm
Page 16	Concerns about school safeguarding practices
Page 16	Recognising abuse or neglect
Page 17	Record keeping
Page 17	Confidentiality
Page 18	Early help
Page 18	Listening to the child
Page 19	Parental involvement
Page 19	Supporting children
Page 20	Child requiring mental health support
Page 20	Child in Need (including those with Child Protection Plan)
Page 20	Allegations made against fellow pupils (Peer-on-Peer)
Page 23	Child on child sexual violence or harassment
Page 23	Bullying
Page 25	Children missing from education
Page 25	Looked after children
Page 25	Team around the child
Page 25	Children and the court system
Page 26	Prevention
Page 26	Policy implementation, monitoring, evaluation and review
	<b>SECTION 2</b>
Page 27	Types, signs and indicators of abuse
Page 28	Identifying Abuse
Page 29	General signs of abuse
Page 30	Child Abduction
Page 30	Child Sexual Exploitation (CSE)
Page 31	Child criminal exploitation: county lines



Page 31	Domestic Abuse
Page 32	'Honour based violence' including FGM
Page 33	Forced marriage
Page 34	Upskirting
Page 35	Homelessness
	<b>SECTION 3</b>
Page 36	Allegations against staff, students, volunteers and the Head Teacher
	<b>SECTION 4</b>
Page 45	Prevent
Page 48	Whistleblowing (see separate policy)
Page 51	Online/E-safety (see separate policy)
Page 52	Physical Intervention/Positive Handling
Page 55	Intimate care
Page 56	Safer recruitment- summary (see separate policy)
Page 58	Appendix I Avon House safeguarding procedure
Page 59	Appendix II Actions where there are concerns about a child

## SECTION 1

### Rationale

Avon House Preparatory School is committed to the protection and safety of children. This policy also applies to Early Years Foundation Stage (EYFS) as the Independent School Standards Regulations also apply to EYFS under Section 157 of the Education Act 2002 and the Education Regulations 2015. '**Child Protection**' is the broad term used to describe the philosophies, standards, guidance and procedures to protect children from both intentional and unintentional harm. The school promotes an environment in which staff feel able to raise concerns and feel supported in their safeguarding roles. Although there are clear procedures to follow within this policy, any member of staff may make a referral to external agencies.

- We maintain rigorous procedures for child protection, in compliance with DfE publication '*Keeping Children Safe in Education*' September 2020, '*Working Together to Safeguard Children*' 2018, '*What to do if you are worried a child is being abused*', '*Prevent Duty Guidance*' August 2015, NSPCC '*When to call the police*', '*The use of Social Media for Online Radicalisation*' July 2015, '*Disqualification under the Childcare Act 2006 (2016)*' and the requirements of the Children Act 2004.

This policy is compliant with the local safeguarding partnerships (local authority, Clinical Commissioning Group (CCG) and local police) and will follow the procedures for the relevant authority. The school also operates government safer recruitment procedures (see separate policy). It is everyone's responsibility to safeguard and promote the welfare of the children in our care. We must consider at all times what is in the best interests of the child. We expect everyone working within the setting (teaching, non-teaching, supply, governors, visitors and volunteers) to take responsibility for following these procedures and to comply with locally agreed inter-agency procedures for protecting children from abuse. Those who work directly



with children should read this policy and part 1 of KCSIE and those who work indirectly with children should also do the same.

**‘Child Protection’** is the broad term used to describe the philosophies, standards, guidance and procedures to protect children from both intentional and unintentional harm. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all staff should make sure that their approach is child-centred. This means that they should consider at all times what is in the best interests of the child.

Avon House Preparatory School is a Rights Respecting School. School policies respect the UN Convention on the Rights of the Child. This Safeguarding Policy links to many of the articles in the Convention.

This policy has been published on the school’s website ([www.avonhouseschool.co.uk](http://www.avonhouseschool.co.uk)) and a hard copy is available from the school office upon request. This policy is reviewed annually or as necessary and reviewed at staff and governors meetings.

Safeguarding in school includes:

- Ensuring student health and safety (see Health & Safety Policy (11) and Risk Assessment Policy (16a))
- Staying safe online (see E-Safety Policy)
- Safer recruitment and appropriate behaviour of staff and volunteers (see Recruitment Policy (18a), Staff Code of Conduct (7e) and Whistleblowing Policy (7b))
- Bullying (see Anti-Bullying Policy (10a))
- Harassment and discrimination (see the school's equality policies, including SEND Policy)
- Meeting the needs of children with medical conditions (see the school's Sickness and Medication Policy and First Aid Policy (13a))
- Providing first aid (see First Aid Policy (13a))
- Educational visits (see Educational Visits Policy (14d))
- Children participating in lessons through age appropriate discussion from Foundation 2 where they take part in a variety of RSE lessons (see RPS Policy)

**The aims of this policy are:**

1. To support the child’s development in ways that will foster security, confidence and resilience.
2. To provide an environment in which children feel safe, secure, valued and respected, feel confident if they are in difficulties and know how to approach adults.
3. To protect children from maltreatment.
4. To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting suspected cases of abuse.
5. To acknowledge the need for effective communication between all members of staff, volunteers and parents in relation to safeguarding pupils.
6. To create a structured procedure within the school, which is followed by all members of staff.



7. To ensure that all adults within our school who have access to children have been checked as to their suitability.
8. To ensure that all policies and procedures of the setting comply with BHR Safeguarding Partnership arrangements, (Barking, Havering and Redbridge), Waltham Forest Hub and Essex Safeguarding Children's Board (ESEB) and other local authority safeguarding partnerships as applicable.
9. To ensure that we practice safer recruitment in checking the suitability of all staff, governors and volunteers who work with children. This includes all those employed or who act in a voluntary capacity for the school as well as those who are employed by other organizations (e.g. cleaning contractors, visiting professionals)

**Systems are required to:**

- prevent unsuitable people working with our pupils;
- promote safe practice and challenge poor and unsafe practice and take all reasonable measures to ensure that risks of harm to pupils' welfare are minimised;
- identify circumstances in which there are grounds for concern about the best interests of a child's welfare, and initiate/take appropriate action to keep them safe (working to agreed local policies and procedures in full partnership with local agencies);
- decide what course of action should be taken dependent on whether a child is in immediate danger or risk of harm.
- contribute to effective partnership working between all those involved in providing services for pupils (e.g. clinical, social services, police).

Independent schools under Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 are required to have arrangements to safeguard and promote the welfare of pupils.

The Disclosure and Barring Service (DBS) was created in December 2012 to provide a new combined barring and criminal records disclosure service. The aim is to help prevent unsuitable people from working with children and vulnerable adults.

**The school's duties include:**

- Ensuring that procedures are in place that are in line with procedures outlined in the DfE guidelines in 'Keeping Children Safe in Education' (September 2020 KCSIE);
- Operating safe recruitment procedures and carrying out DBS checks on new staff and regular volunteers;
- Ensuring that there are procedures in place for dealing with allegations of abuse against members of staff/volunteers (including the Head Teacher) that comply with procedures;
- Providing a designated person for child protection;
- Providing training for all staff and training for the designated person and deputy designated person in inter agency work (all staff every three years and designated person training every two years);
- Remedying any weaknesses in child protection arrangements without delay;
- Undertaking an annual review of safeguarding policies and procedures;



- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and that such concerns are addressed sensitively and effectively in a timely manner, in accordance with the school's Whistleblowing Policy.
- Ensure that those who provide co-curricular provision follow the school procedures for safeguarding and have read this policy.

### **Designated People:**

- The Headteacher, Mrs Amanda Campbell, is the Designated Safeguarding Lead (DSL) for the whole school including EYFS and has attended the relevant training. Training is updated every two years. The DSL has regular contact with the local authority LADO.
- The Deputy DSL for the EYFS is Mrs Rebecca Telling and for the whole School are Mr Gavin Biston and Mrs Helen Dunne. They have attended relevant training which is updated every two years.
- The DSL will undertake inter-agency training every two years to Level 3.
- The Governor responsible for safeguarding Mrs Fay Cookson is the Governing Body Lead for safeguarding. Training is updated every two years.
- If any staff (teaching or non-teaching) have any concerns that a child may be being abused, they should speak to the DSL (or in her absence, the Deputy DSLs). If their concern involves the Head Teacher they should speak to the governor responsible for safeguarding or the chair of Governors **without first notifying the Head Teacher**. The governor will then report immediately to the LADO.
- If the DSL or Deputy DSLs believe that a child has been abused or is at serious risk of being abused it is their duty to contact external agencies **immediately** within one working day.

### **The Role of the Designated Safeguarding Lead**

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection across the school. They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of children. They will advise and support other members of staff on child welfare and child protection matters, and liaise with relevant agencies such as the local authority and police. Some safeguarding activities may be delegated to deputies, although the DSL will retain lead responsibility for the work of deputies and will ensure it is completed to the highest standard.

There are many aspects to the role of the Designated Safeguarding Lead, which include:

#### ***Managing referrals***

- To refer cases of suspected abuse to the local authority children's social care and support staff who make referrals to local authority children's social care.
- To work with the three safeguarding partners and other agencies as described in Working Together to safeguard children and the NSPCC 'When to call the police'.
- To work with the governor responsible for safeguarding in referring cases to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme.
- To work with the governor responsible for safeguarding in referring cases to the Disclosure and Barring Service where a person is dismissed or left due to risk or harm to a child.



- To keep detailed, accurate and secure written records of concerns and referrals, even if there is no immediate referral. Records are kept confidentially, separately from pupil records.

### ***Working with staff and other agencies***

- To ensure staff can access and understand the school's safeguarding policy and procedures and any other relevant policies (especially new and part time staff).
- To inform the Deputy DSLs of safeguarding issues, especially ongoing enquiries into whether a child is at risk of harm, and police investigations.
- To liaise with the case manager and the local authority's designated officer for child protection concerns in all cases where a member of school staff is involved.
- To liaise with staff on matters of safety and safeguarding (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies.
- To act as a source of support, advice and expertise for staff.

### ***Training***

- To undergo training to develop and maintain the knowledge and skills required for the role and to refresh knowledge and skills at least annually to remain up to date with any developments relevant to the role.
- To undergo Prevent training and be able to:
  - support the school in meeting the requirements of the Prevent Duty.
  - provide advice and support to staff on protecting children from the risk of radicalisation.
- To understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- To 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.
- To ensure that each member of staff has access to, and understands, the school's Safeguarding Policy and Procedures – especially new and part time staff.
- To be alert to the specific needs of children in need and those with special educational needs.

### ***Child protection file***

- To ensure that a child protection file is transferred to a new school as soon as possible when children leave the school. This should be transferred separately from the main pupil file, ensuring secure transit and obtaining a confirmation of receipt
- To consider sharing any relevant information with a new school in advance of a child leaving.

### ***Multi-Agency Working***

The School's three safeguarding partners within London Borough of Redbridge are:

1. The Local Authority (Redbridge Council)
2. NHS Redbridge Clinical Commissioning Group
3. London Metropolitan Police

The Local Safeguarding Partners make up the Barking, Havering and Redbridge Safeguarding Children's Board.





### **The Role of Staff**

Staff understand that their responsibility to safeguard children requires that all staff share concerns they may have about pupils, in an appropriate manner. All 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 best interests of the child.

When a pupil has made a disclosure the member of staff should:

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the pupil to talk freely
- reassure the pupil but do not make promises which it might not be possible to keep
- not promise confidentiality - it might be necessary to refer to one of the Designated Members of Staff for Safeguarding.
- reassure him or her that what has happened is not his or her fault
- stress that it was the right thing to tell
- listen, rather than ask direct questions
- ask open questions rather than leading questions (ie avoid questions to which ‘yes’ or ‘no’ is an answer)
- not criticise the perpetrator
- explain what has to be done next and who has to be told
- make some brief notes as soon as possible after the conversation
- retain the original notes in case they are needed by a court
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the pupil
- draw a diagram to indicate the position of any bruising or other injury
- record what the pupil said in his or her own words, not those of the member of staff; avoid interpretations or assumptions
- record decisions that are made and if in doubt refer to the DSL

Staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating. All staff have a responsibility to provide a safe environment in which children can learn. All staff should be confident in understanding what to do if a disclosure is made. The list below is not exhaustive:

- Neglect
- Physical or mental abuse
- Involvement in criminal activity including knife crime
- County lines drug dealing

In a time where more emphasis is put on technology and online learning, staff should be vigilant with regard to the risks of online abuse as well as day to day life.

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child’s life. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.



Any staff member who has a concern about a child's welfare should follow the referral processes set out below, remembering that parental consent is not needed if the member of staff feels that the child is at risk of harm. Staff may be required to support social workers and other agencies following any referral. The pastoral care team will also be made aware so the child can be supported through Team Around the Child.

The Teachers' Standards 2012 state that teachers, including heads, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

No one person can have a full picture of a child's needs and so everyone who comes into contact with the child will have a part to play. Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism. In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral directly to children's social care for assessments under 'The Children's Act' especially sections 17 and 47. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

### **The Role of the Governors**

The Governing Body has nominated one of its members (Fay Cookson) to take leadership responsibility for the school's safeguarding arrangements. The Safeguarding Governor and the Chair of Governors receive appropriate training to enable them to fulfil their safeguarding responsibilities. All Governors undertake online safeguarding training.

Governors should:

- Ensure that those with leadership and management responsibilities in the school actively promote the wellbeing of all children.
- Ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- Ensure that the school's Safeguarding (Child Protection) Policy is provided to parents.
- Ensure that the school's safeguarding arrangements take into account the procedures and practice of the Local Safeguarding Children Board, including understanding and reflecting local protocols for assessment and the referral threshold document.
- Ensure procedures are in place for children who go missing which may link to a range of safeguarding risks including neglect, abuse, exploitation, mental health problems and other issues.
- Ensure that the wishes and feelings of the child are taken into account when deciding on what action should be taken.
- Ensure systems are in place for children to express their views and give feedback.
- Ensure where reasonably possible more than one emergency contact number for each child is kept.
- Ensure that the school operates safer recruitment procedures and makes sure appropriate checks are carried out on those who work with children.
- Ensure that the school has appropriate arrangements for dealing with concerns and allegations about staff, supply staff and volunteers.





- Ensure all staff undertake the required child protection training and that mechanisms are in place to assist all staff in understanding their roles and responsibilities in relation to child protection and safeguarding.
- Ensure that teachers manage a safe and secure educational environment and have clear understanding of the children in their care including those with mental health needs.
- Ensure that the school contributes to inter-agency working, including providing a coordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans.
- Ensure that any deficiencies or weaknesses in regard to safeguarding arrangements are remedied without delay.
- Undertake an annual review of safeguarding.



### Key contacts in school

<b>DESIGNATED SAFEGUARDING LEAD WHOLE SCHOOL INCLUDING EYFS</b>		
NAME:	Amanda Campbell	
CONTACT NUMBER:	020 8504 1749	
<b>DEPUTY DESIGNATED SAFEGUARDING LEAD INCLUDING EYFS</b>		
NAME:	Rebecca Telling	
CONTACT NUMBER:	0208 504 1749	
<b>DEPUTY DESIGNATED SAFEGUARDING LEAD</b>		
NAME:	Gavin Biston	
CONTACT NUMBER:	Helen Dunne 0208 504 1749	
<b>NOMINATED GOVERNOR FOR SAFEGUARDING</b>		
NAME:	Fay Cookson	
CONTACT NUMBER:	020 8559 0708	

Email addresses for the above will be given to parties upon request.

### Key contacts within the Local Authority

The Redbridge Local Safeguarding Children Board is able to provide advice and consultancy and is the first point of contact for schools and education services should an allegation against an adult working within an education setting arise.		
CONTACT NUMBER: 9am-5pm Monday-Friday	020 8708 3885	CPATreferrals@redbridge.gov.uk
Out of Hours	020 8708 5897	CPATreferrals@redbridge.gov.uk
Local authority designated officer LADO	020 8708 5350 020 8708 5371	Lado@redbridge.gov.uk
<b>Waltham Forest Local Safeguarding Children Board</b>		
CONTACT NUMBER: 9am-5pm Monday-Friday	020 8496 2762	Mashrequests@walthamforest.gov.uk
Out of Hours	020 8496 3000	
Local authority designated officer LADO	020 8496 3646 020 8496 6310	
<b>Essex Safeguarding Children Board</b>		
CONTACT NUMBER: 9am-5pm Monday-Friday	0345 603 7627	
Out of Hours	0345 606 1212	
Local authority designated officer LADO	03330 139797	Childrens.safeguarding@essex.gov
If the school believes that there is an immediate risk of significant harm to a child, contact the Police on 999.		

Each partnership listed above has issued guidelines which can be found in the Safeguarding File with this policy in the DSL's cupboard.



## **Staff Training**

All staff receive appropriate safeguarding and child protection training every three years or as appropriate to level 1. In addition, staff receive safeguarding and child protection updates (eg by email, newsletters and staff meetings), at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.

All staff, whether full time, part time or voluntary, are made aware of arrangements for child protection and are provided with each latest version of 'Keeping Children Safe in Education', which they are required to read.

Safeguarding update training is carried out at the start of each academic year (including a copy of KCSIE part 1 and annex A). Staff receive update training when new procedures or policy come into force, and updates are given at the start of each term and at weekly staff briefings.

All staff undertake Prevent training through EduCare and in their three year cycle with face to face training.

Staff complete Online Safety training through EduCare.

All staff are made aware of the identity of the Designated Safeguarding Lead and Deputies. Posters appear in prominent places around the school displaying the photographs of the DSL and the pastoral care team.

All staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that might follow a referral, along with the role they might be expected to play in such assessments.

Staff training includes raising awareness of issues including children who run away or go missing, female genital mutilation and child sexual exploitation. Training will also reference online abuse and how technology is used to facilitate offline abuse.

Staff know what to do if a child tells them they are being abused or neglected. Staff know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse as this may ultimately not be in the best interests of the child.

Staff have been advised that they are not allowed to take photographs of children using their own mobile phone or personal camera.



Staff and volunteers must take steps to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm (for example in 1:1 tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on). Assurance must be obtained that appropriate safeguarding checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (for example, in a separate institution).

Staff are made aware of all policies relevant to safeguarding and their locations.

### ***Staff Induction***

Before a new member of staff, temporary staff or volunteer engages with the pupils, staff induction will take place. All volunteers in regulated activity will have safeguarding training and receive updates alongside staff. This takes the form of:

- arrangements for safeguarding and lines of reporting and communication.
- Online safeguarding training
- guidance in the use of school policies including:
  - Safeguarding
  - Whistleblowing
  - Behaviour
  - Supervision of children
  - Children who go missing in education
  - Staff code of conduct and acceptable use policy

### ***Contractors***

All contractors who may be on site when there are children present will be DBS checked or not left unsupervised.

Contractors who regularly attend school will be given basic guidance on safeguarding and school policy. Contractors will be directed as to who the DSL and DDSL's are and where they are located during the school day should they require them. All contractors are informed before they start work of guidelines on the Avon House Mobile Phone Policy and dress code appropriate to the role they are carrying out.

### ***General Procedures***

All applicants for jobs at the school are scrutinised by verifying their identity and suitability for working with children by a Disclosure and Barring Service 'enhanced' check, checking they are not disqualified from being with children, seeing evidence of any academic or vocational qualifications, obtaining professional and character references, checking previous employment history and that the candidate has the health and physical capacity to do the job.

Procedures are in place for dealing with allegations of abuse against staff and volunteers who work with children. Staff have a duty to inform the Head Teacher if they have concerns that a



child is being abused, even if the concern involves another employee at the school in line with the schools Whistleblowing Policy.

The Safeguarding Governor undertakes an annual review of the school's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged. Any deficiencies or weaknesses in child protection arrangements will be remedied immediately.

Staff should refer to this Policy to ensure that their behaviour and actions do not place themselves at risk of harm or of allegations of harm to a pupil, for example in 1:1 tuition, sports coaching, conveying a pupil by car or engaging in inappropriate electronic communication with a pupil. It is the practice of this School to include some photographs or images of pupils in the School's promotional material such as the prospectus and website. Parents who do not want their child's photograph or image to appear in any of the School's promotional material must ensure their child is aware of this and include a declaration to this effect on the Registration Form (if they are a new Pupil) or Pupil Information Form (if they are a returning Pupil) at the start of the academic year.

### **School procedures for dealing with a Safeguarding concern about a child**

If a member of staff is concerned about a pupil's welfare, the matter should be reported to the DSL as soon as possible. On being notified of a concern the DSL will consider the appropriate course of action in accordance with the MASH Team advice. If it is decided that a referral is not required, the DSL will keep the matter under review. The pastoral care team will be made aware so the child can be supported through Team Around the Child.

If, in exceptional circumstances, the DSL or Deputy DSL are not available, this should not delay appropriate action being taken and any staff member should make a referral to children's social care (see key contact details on page 9).

If anyone other than the DSL makes the referral, they should inform the DSL as soon as is practically possible.

If a member of staff is alerted to a complaint of abuse or neglect or an allegation from a child they must follow this procedure:

- Take time to listen
- Avoid asking leading questions
- Not guarantee absolute confidentiality but explain that sometimes information must be passed to someone who can take further action if required
- Reassure the child that they have not done anything wrong by telling

If staff have any concerns about a child, they will need to act on them immediately to decide what action to take.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. The record will be added to the concerned child's file and dated and signed.



Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

The guide, *Information Sharing: Advice for practitioners providing safeguarding services to children* (<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>) supports staff who have to make decisions about sharing information.

This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and GDPR:

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

If in any doubt about sharing information, staff should speak to the DSL or a Deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the security of children.

The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. Permission/contact is not required.

If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.





If early help is appropriate the DSL (or Deputy) should lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not improve or gets worse.

Whilst all staff should speak to the DSL (or Deputy) with regard to any concern about Female Genital Mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

The DSL will refer concerns to the Redbridge Local Authority Designated Officer (LADO) or the DfE. If it is decided to make a referral this will be done with prior discussion with the parents, unless to do so would place the pupil at further risk of harm. If there is any risk of immediate harm to the child, then a referral will be made to children's social care immediately. If a referral is made and the child's situation does not seem to be improving the DSL or the person making the referral will ask for further considerations to be addressed to aid the improvement of the child's situation.

Particular attention will be paid to the attendance and development of any pupil about whom the school has concerns, or who has been identified as being the subject of a child protection plan (formerly referred to as the Child Protection Register) and a written record will be kept.

We need to establish a safe environment in which children can learn and develop. This will include opportunities in the PSHEE curriculum and school assemblies for children to develop the skills they need to recognise and stay safe from abuse. Children will be made aware of their rights. Posters giving national children's help lines (Child Line / NSPCC) are displayed in the Prep changing room and school quiet room. All pupils are aware that they can talk freely and openly to their class staff, house leader, Extended Education Provider or a senior member of staff.

If a pupil who is/or has been the subject of a child protection plan changes school, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school, in a secure manner, and separate from the pupil's academic file. Children in need should be referred to children's social care. This should lead to inter-agency assessment using local processes such as use of the 'Common Assessment Framework' (CAF) or 'Team Around the Child' (TAC).

### ***Supporting Staff***

We recognize that staff working in school (and) who have become involved with a pupil who has suffered harm, or is likely to be suffering from harm, may become distressed and need support. Amanda Campbell (the Head Teacher) will offer support or take steps to refer them for counselling if appropriate.



### **Children suffering, or likely to suffer, significant harm**

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and/or the police) is made immediately, remembering that parental consent is not needed if the member of staff feels that the child is at risk of harm. Anyone can make a referral.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

### **Concerns about School Safeguarding Practices**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and that such concerns will be taken seriously by the SLT. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the SLT. Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call: 0800 028 0285 – line is available from 8.00 am to 8.00 pm, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). (See Appendix II)

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

If staff members have safeguarding concerns, or an allegation is made about another staff member, supply staff or volunteer, this should be referred to the Head Teacher. Where there are concerns about the Head Teacher this should be referred to the Safeguarding Governor or chair of Governors **without first informing the Head Teacher**.

Deficiencies or weaknesses identified in child protection arrangements must be remedied without delay and any points raised referred to the School Governors.

### **Recognising Abuse or Neglect**

All staff and volunteers should be concerned about a pupil if he/she:

- Has any injury which is not typical of the bumps and scrapes normally associated with accidental injury.
- Regularly has unexplained injuries or absences.
- Frequently has injuries (even when apparently reasonable explanations are given).
- Gives confused or conflicting explanations about how injuries were sustained.
- Exhibits significant changes in behaviour, performance or attitude.
- Indulges in sexual behaviour which is unusually explicit and /or inappropriate to his or her age/stage of development.
- Discloses an experience in which he or she may have been significantly harmed.
- Any other cause to believe that a pupil may be suffering harm.

Abuse or neglect can have a damaging effect on a child's health, education attainment and emotional wellbeing. Staff may see changes in behaviour patterns in existing pupils which are



likely to impact adversely on a child's performance at school. Such changes may not necessarily indicate that a child is suffering abuse or neglect. In some cases those changes may be symptoms of a hidden disability or undiagnosed medical condition. Staff must be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. Multiple issues may overlap with one another.

Children are put at risk of harm by a variety of behaviours. These may include:

- Drug/alcohol abusing parents
- Emotional abuse
- Verbal abuse
- Domestic violence
- Children and young people who sexually abuse
- Sexual exploitation of children
- Female genital mutilation

*See section 2 for full definitions, signs and indicators of abuse*

### **Record Keeping**

All concerns discussions and decisions should be recorded in writing. When a pupil has made a disclosure, the member of staff/volunteer should:

- Make brief notes as soon as possible after the conversation
- Not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the pupil and this should then be signed
- Draw a diagram to indicate the position of any bruising or other injury
- Record statements and observations rather than interpretations or assumptions
- All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

All written records of concerns about children, even where there is no need to refer immediately, will be kept. Written records are kept securely, separate from the main pupil files, and in a locked location. An electronic referral and notes are kept on the school data management system in a secure portal to which the Head Teacher has access.

### **Confidentiality**

Child protection raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

All staff in school, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (the children's schools, families and the police).

If a pupil confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the pupil in a manner appropriate to the



pupil'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 pupil or other children safe.

Staff/volunteers who receive information about pupils and their families in the course of their work should share that information only within appropriate professional contexts.

If in doubt, the school will contact the Local Authority Designated Officer (LADO) or the MASH Team.

### **Early Help**

A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL.

The school will liaise closely with the local partnerships, including acting as lead professional to co-ordinate support, as appropriate, with the agreement of the child (where appropriate) and their parent/carer(s), and in accordance with local partnership procedures. This may include 'common assessment framework' (CAF).

If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

All staff should be alert to the potential need for early help if the child:

- has a specific additional need or is disabled (with or without a health care plan)
- is a young carer
- has a mental health need
- is showing signs of behavioural issues
- is at risk of being radicalised, exploited or in modern slavery
- is at risk of honour based abuse such a FGM or forced marriage
- is misusing drugs or alcohol
- frequently goes missing from home
- is persistently absent from education
- has been in care
- has a parent in prison

### **Listening to Children**

Children will speak to people that they feel they can trust and they feel comfortable with. This will not always be a teacher. For this reason all staff (teaching and non-teaching) are trained in child protection so that they know how to respond sensitively to a child's concerns, whom to approach for advice about them, and the importance of not guaranteeing complete confidentiality. Posters giving national children's help lines (Child line/NSPCC) are displayed in the quiet room and the Prep changing rooms. Any member of staff who is approached by a child wanting to talk should listen positively and reassure the child. They should record the conversation on an encounter form as soon as possible, distinguishing clearly between fact, observation, allegation and opinion, noting any action taken and signing and dating the note.



They should then inform the Head Teacher (or in her absence one of the Deputy DSLs). The member of staff should be aware that the way in which they talk to the child could have an effect on the evidence that is put forward if there are subsequent proceedings. Staff should not jump to conclusions, ask leading questions, or put words in a child's mouth. There should be no pressure to talk or to stop the child from freely recalling.

Staff should be aware that:

1. It is not their responsibility to investigate suspected cases of abuse
2. They should not take any action beyond that advised in the Redbridge Child Protection Procedures
3. They cannot promise a child 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
4. If they have concerns about a child's welfare, or if a child discloses that he/she is suffering abuse or reveals information that gives ground for concern, they should speak to the Head Teacher (or in her absence, a Deputy DSL)
5. They must avoid asking leading questions
6. Accusations of abuse by one or more children against another child should be immediately reported to the designated person who will take advice from the Education Safeguarding Service within 24 hours of disclosure or suspicion of abuse
7. Procedures for dealing with allegations of abuse by a member of staff are outlined in this policy. All such allegations should be reported immediately to the designated person, who will contact the LADO immediately or within 24 hours of disclosure or suspicion of abuse

### **Parental Involvement**

Parents need to understand that the school has a duty to safeguard and promote the welfare of the children at the school, that this responsibility necessitates a safeguarding policy and procedures and that the school may need to share information and work in partnership with other agencies when there are concerns about a child's welfare.

The school will normally seek to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement to making referrals to social services. If the Head Teacher has reservations about involving the child's family, she will seek advice from Redbridge Children Safeguarding Board.

### **Supporting Children**

Our curriculum is flexible, relevant and engages students' interest. We use our approach to teaching and learning to promote safeguarding, including through teaching students how to stay safe, how to keep themselves from harm and how to take responsibility for their own and others' safety. Personal, social, and health education plays a crucial part in teaching children and young people to recognise dangers and harmful situations as well as increasing their awareness of preventative actions they can take to keep themselves safe, including online and e-safety. This is linked to our RPS Policy. As part of the schools programme for teaching RSE and health education, staff will be vigilant to respond to the children's questions and comments. RSE will cover all guidelines as laid down in RSE guidance (mandatory from 2020). We recognise that



our senior leadership team need to ensure teachers incorporate elements of safeguarding into assemblies, lesson plans and schemes of work, so that safeguarding is seen as part of wider teaching and learning. Safeguarding is also as much about students' emotional and mental well-being as it is about their physical well-being. We create a culture of care where students are tolerant and respectful of each other and accept individual differences. There is a strong approach to developing social and emotional skills in our school so that as children mature they are able to reflect on their own and other's rights and responsibilities. Children and young people have confidence in our school and trust the adults who work with them. Staff are approachable and helpful. Children feel secure and well protected, which is reflected in their positive attitudes to school.

As a school we are aware that children are using the internet more and therefore need safeguarding from harmful and inappropriate online material. Filters have been placed on the school network and monitoring systems are in place.

### **Child requiring mental health support**

We have a significant role to play in supporting the mental health and wellbeing of the children in our care. These issues can be an indicator that the child is suffering from a form of abuse. At Avon House we have access to a school counsellor (Brentwood Catholic Childrens Society) who supports children who need professional support. This is always done in consultation with the parents. The school nurse has attended a mental health first aid course to support children in the first instance and this all runs along-side the safeguarding procedures.

### **Child in Need (including Child Protection Plans)**

Children in school who need a social worker due to safeguarding or welfare issues will be supported in a variety of ways.

- The DSL will share information with staff on a need to know basis
- Additional academic support will be provided as required
- Pastoral support will be put in place which will be shared with the allocated social worker.

Information regarding attendance and academic performance will be shared with relevant parties as required.

### **Allegations made against fellow pupils (Peer on Peer Abuse)**

Children can abuse other children. This is generally referred to as 'peer on peer abuse' and is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse





- ‘Upskirting’, which 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
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals.

All staff must be clear as to the school’s policy and procedures with regard to peer on peer abuse and recognise that children are capable of abusing their peers which must be dealt with promptly. In most instances, the conduct of students towards each other will be covered by the school’s Behaviour and Discipline Policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include: physical abuse, emotional abuse, sexual abuse and sexual exploitation. The school's approach to sexting is that the use or distribution of any illegal material will not be tolerated. Neither will cyber bullying. It is a particularly pernicious form of bullying because it is so pervasive and anonymous and the victim can be targeted at any time or place.

Advice provided by the NSPCC is very useful: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/>.

It is likely that, to be considered a safeguarding allegation against a child, one or more of the following features may be found about the allegation:

- it is made against an older pupil and refers to their behaviour towards a younger or more vulnerable pupil
- it is of a serious nature, possibly including a criminal offence
- it raises risk factors for other pupils in the school
- it indicates that other pupils may have been affected by this student
- it indicates that young people outside the school may be affected by this student

There are many different forms that peer on peer abuse can take. Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. Some examples of peer on peer abuse include:

#### ***Physical Abuse***

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol
- Initiation/hazing type violence

#### ***Emotional Abuse***

- Blackmail or extortion
- Threats and intimidation

#### ***Sexual Abuse***

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

#### ***Sexual Exploitation***

- Encouraging other children to engage in inappropriate sexual behaviour (e.g. having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)



- Photographing or videoing other children performing indecent acts

### ***What Staff should do if they believe there to be Peer on Peer Abuse***

In the event of allegations made against other pupils, the measures detailed in the school's Anti-Bullying Policy will be enacted. This will include sexting or abusive comments and interactions that may be seen as "banter", "just having a laugh" or part of growing up. The school is also aware of the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. Staff should also recognize that issues associated with disability, gender, ethnicity and sexual orientation may make it harder for a child to report abuse. We will take all peer on peer abuse seriously. Children with SEND or health issues may be more vulnerable and may also find it difficult to communicate their concerns but staff should always refer concerns to the DSL or SENCo and follow the school procedures for recording and referral.

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the DSL should be informed. A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances. The DSL should contact the Local Authority Children Safeguarding Board to discuss the case. The DSL will follow through the outcomes of the discussion and make a referral where appropriate. If the allegation indicates that a potential criminal offence has taken place, the local authority will refer the case to the multi-agency safeguarding hub where the police may become involved. Parents, of both the pupil being complained about and the alleged victim, should be informed and kept updated on the progress of the referral. The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files. It may be appropriate to exclude the pupil being complained about for a period of time according to the school's Behaviour and Discipline Policy. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

The following will also take place in a timely manner:

- The victim will be interviewed on his/her own and may be asked to write an account of events. He/she will be offered support to develop a strategy to help him or herself.
- The bully(ies), together with all others who were involved, will be interviewed individually and asked to write an immediate account of events. It will be made clear why his/her behaviour was inappropriate and caused distress. He/she will be offered guidance on modifying his/her behaviour, together with any appropriate disciplinary sanctions.
- We should recognise that suitable support is needed both for pupils who are being bullied and for pupils who bully others, as well as dealing with appropriate disciplinary measures.

As usual, important decisions should be made on a case by case basis, on the basis of an assessment of the children's best interests. Key specific considerations will include:

- the age, maturity and understanding of the children;
- any disability or special needs of the children;
- their social and family circumstance;
- any evidence in the behaviour of the children that might suggest they have been harmed;



- any evidence of pressure to engage in sexual activity;
- any indication of sexual exploitation.

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and to consider the support and intervention required for those involved. In the event of disclosures about pupil on pupil abuse all children involved, whether perpetrator or victim, will be treated as being 'at risk'.

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

### ***Procedures to Minimise the Risk of Peer on Peer Abuse***

It is important to develop appropriate strategies in order to prevent the issue of peer on peer abuse rather than manage the issues in a reactive way. Firstly, and most importantly is recognition that peer on peer abuse can and will occur even with the most stringent of policies and support mechanisms. It is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting pupils to talk about any issues by sharing information with staff.

This can be supported by ensuring that the school has an environment where pupils feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through a strong and positive RPS curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

### **Child on child sexual violence or harassment**

Reports of this nature are likely to be complex and may require difficult decisions to be made. It is important that all victims are reassured that the allegation is being taken seriously and that they will be supported. The wishes of the victim should always be considered. Parents or carers of the child should be informed and supported. When there has been a report of a sexual nature the DSL will carry out a risk and needs assessment. This will be kept under review throughout the process. The DSL will work closely with the local authority children's care services and any referral to the police will be run in parallel with this process. The school would ask staff to consider the following:

- not to promise confidentiality but assure the victim that information is being shared with the correct agencies
- listen carefully and be non-judgemental only asking open ended questions
- facts should be recorded accurately and should not express personal opinions



Children's and Young People's Independent Sexual Violence Advisors (CHiSVAs) can give practical advice and support for victims of sexual violence.

### ***The Response to a Report of Sexual Violence or Sexual Harassment***

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. **A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out above. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL (or a Deputy).

Sexual violence or harassment can occur between two children or a group of children on a single child and can occur face to face or online. These reports are likely to be complex and require difficult decisions to be made. The investigation should be run with social care and the police as appropriate. Some children may face barriers which affect reporting due to sexual orientation, gender, disability or ethnicity. At all points listening to the child is important. It is important to:

- be non- judgemental
- not ask leading questions
- reflect back with the child
- discover how the child has been harmed

A written record which includes only the facts and no personal opinion must be kept. If there is an online element the school must NOT forward illegal images.

The person conducting the investigation should also carry out an initial risk assessment and should consider supporting the victim, any other children involved, and the alleged perpetrator(s). The RA should be kept under constant review and consider how all are protected. The DSL or deputy will ensure that all agencies are fully engaged and informed.

### ***Considerations***

- The wishes of the victim in terms of how to proceed on their behalf
- The age of the child
- The developmental stage of the child
- Any disabilities
- Any on-going risks to the victim, other children, staff and family
- Other wider contexts including child sexual exploitation or child criminal exploitation
- Shared working environments (classrooms)

As in all areas, all those concerned about the welfare of the child should act in their best interests and follow the school safeguarding policy and procedures. It is important that all information is passed on for immediate consideration and not passed off as "banter", "part of growing up" or "having a laugh".



*The National Organisation for the Treatment of Abusers (NOTA) will provide support for professionals working in and with or matters relating to sexual offending.*

### **Bullying**

A bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. (See separate policy)

### **Children going Missing from Education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the school's unauthorised absence and children missing from education procedures. The school is under a legal duty to deal with children who miss schooling in these circumstances, particularly on repeat occasions and for those children who leave school without clear indications of where they will be continuing their education. (See separate policy)

### **Looked after children**

Where the school welcomes a student who is looked after by the local authority, the school will nominate a suitably trained designated teacher with responsibility for looked after children. This person acts as the key link with the local authority to ensure that staff have up to date assessment information, the most recent care plan and contact arrangements with parents. The DSL will hold the details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

### **Team Around the child**

Aaron Bowers, Jerry Evans, Ayla Heath and Gabriella Erratt (four House Leaders) and Emma Wratten (Extended Education Provider) are designated as LACs for 'looked after children' and will check lists of pupils who need to be supported and cared for at school. They will be known as advocates and will support and represent the pupil's best interest at all times. Children with SEND can sometimes face safeguarding challenges. The EEP will ensure that any communication barriers or other difficulties are factored into any discussion. This will be reviewed and updated regularly. If a pupil leaves Avon House we will ensure that all documentation is sent to the relevant agencies under confidential cover and a photocopy will be kept in school for reference. This group meets fortnightly unless there are concerns when additional meetings are put in place to discuss the pupil concerned.

### **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There is an age appropriate guide to support children 5-11 years old. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use



of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Prevention**

We recognize that the school plays a significant part in the prevention of harm to our pupils by providing pupils with effective lines of communication with trusted adults, supportive friends and an ethos of protection.

The school will therefore establish and maintain an ethos, which is understood by all staff, which enables pupils to feel secure and encourages them to talk knowing that they will be listened to. We also ensure that all pupils know which adults in school they can approach in confidence if they are in difficulty or worried.

### **Policy Implementation, Monitoring, Evaluation and Review**

The Governors and the Head Teacher are responsible for ensuring the annual review of this policy takes place by 31<sup>st</sup> August each academic year. Governors will be informed of any changes or amendments to the policy to which they will need to agree. All staff will then be advised accordingly through staff meetings. A copy of the amended policy will be displayed in the staff room, a summary included in the staff handbook and on the school T-drive. New staff will have face-to-face induction with the DSL before they start working with children. All supply teachers, contractors and volunteers will also receive training and policy information before they start working with children. A self-review tool for safeguarding and child protection in schools will provide a base for our review which is carried out before the start of the school year by the DSL and the Safeguarding Governor.

Advice may be sought from the Metropolitan Police Child Protection unit at Ilford and Essex Police Child Protection or the NSPCC. Full written records will be kept of action taken and advice received.

Signed by Chair of Governors

Signed by Head Teacher

Date:

Reviewed and amended September 2019 AC

Reviewed and amended January 2020 AC

Reviewed and amended September 2020 AC





## SECTION 2

### Types, signs and indicators of abuse

Indicators of Abuse and Neglect Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Child abuse may fall into one of the following categories. These categories represent the criteria for registration on the Child Protection Register. Further and more age specific examples can be found on the NSPCC website ([help@nspcc.org.uk](mailto:help@nspcc.org.uk)).

#### **1. *Physical Abuse***

This is a form of abuse that 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.

#### **2. *Emotional Abuse***

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

#### **3. *Sexual Abuse***

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by



adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

#### 4. *Neglect*

This 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. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### 5. *Discriminatory Abuse*

A child overly concerned about race or sexual preference

A child tries to be more like others

A child reacts angrily if any attention is paid to them e.g race, gender

### **Identifying Abuse**

It is always preferable to prevent abuse or for intervention to take place at the earliest possible stage. All school staff are well placed to observe outward symptoms which may be due to child abuse. Some of the signs and symptoms are as follows:

#### 1. *Physical*

Bruising / aggression / moody / bed-wetting / absences / lethargy / make up to cover bruising / hanging about after school / anxious on Friday afternoon and the end of term. (For further information on bruising which indicates abuse and the use of body maps see the Waltham Forest Safeguarding Children Board website).

#### 2. *Emotional*

Tantrums / attention seeking / mood swings / poor knowledge of right and wrong / isolation / lack of communication. Children can be harmed by witnessing abuse, eg domestic violence. The child might be ignored / belittled / shouted at / terrorised / told they are useless etc.

#### 3. *Sexual*

Provocative behaviour / new sexual language / fear of adults / secretive / refusing to allow physical contact / desire to cleanse / emphasising sex through play / self-mutilation / pregnancy / bleeding / anorexia / bulimia. Usually perpetrated by people who are known to, and trusted by, the child, eg relatives, family friends, neighbours, babysitters, people working in schools, clubs or activities.

#### 4. *Neglect*

Weight loss or gain / lack of hygiene / fainting / slow physical development / hunger / tiredness / nightmares / imagining friends. Clear lack of parental care. Often poverty contributes. Can include parents/carers failing to provide adequate food, clothing and shelter / protect a child from physical and emotional harm or danger / ensure adequate supervision or stimulation / ensure access to appropriate medical care or treatment.



Abuse can take place by one or more pupils against another pupil, and may not involve adults. Referrals should be made to local agencies if a child is suspected to be abused by an adult or another child.

### **General signs of abuse**

There are many signs of abuse that staff should be aware of. These include:

- unexplained delay in seeking treatment which is needed
- incompatible explanations
- a series of minor injuries
- unexplained bruising:
  - in and around the mouth
  - black eyes – especially if both eyes are black and there is no bruising; to forehead or nose
  - grasp marks
  - finger marks
  - bruising of the ears
  - linear bruising (particularly buttocks or back)
  - differing age bruising
- bite marks
- burns and scalds (including from cigarettes)
- general physical disability
- unresponsiveness in the child
- soiling and wetting
- change in behavioural pattern
- frozen look
- attention seeking
- apprehension
- anti-social behaviour
- unkempt appearance
- sexually precocious behaviour
- sexualised drawings and play
- female genital mutilation
- sudden poor performance in school
- poor self-esteem
- self-mutilation
- withdrawal
- running away or going missing
- reluctance to return home after school
- resistance to undressing for PE
- resistance to school medicals
- difficulty in forming relationships
- confusing affectionate displays
- poor attendance – repeated infections etc
- excessive dependence
- poor growth



No list of symptoms can be exhaustive. They may give rise to concern but are not in themselves proof that abuse has occurred. Where a member of staff is concerned that abuse may have occurred, he or she must report this immediately to the designated teacher who has specific responsibility for child protection.

Mental health problems can, in some cases, be an indicator that the child is suffering abuse, neglect or exploitation. It is not for us to diagnose mental health problems but our observations can help in the creation of a clear picture which can then be dealt with by a professional.

We recognize the importance of partnership between home and school but where issues of child abuse or suspected child abuse arise, our first and only responsibility is to the child. We may not be able to prevent child abuse but by following child protection procedures, we will try our best to protect all our children; this is our prime objective.

### **Child Abduction**

This is the unauthorized removal of a child from a parent who has legal responsibility for the child. Child abduction can be by a parent or family member; it is not necessarily someone the child does not know. As a school we have a policy on when children can come and leave school unescorted by an adult (Year 6). The school has clear guidelines and protocols that must be followed and signed for if a child is to make this step. During PSHEE lessons Year 6 are guided as to safe practices for such occasions and in preparation for secondary school.

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

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

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



Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of child 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
- children who regularly miss school or education or do not take part in education

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. One way of identifying involvement in county lines is where the child may go missing from home or school.

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual



- financial
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### **So-called ‘honour-based’ violence (including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the DSL (or Deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency 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 following section).

Female Genital Mutilation FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **FGM Mandatory Reporting Duty for Teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still





consider and discuss any such case with the school's DSL (or Deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

## **Forced Marriage**

Forced marriage is a term used when a person is made to marry against their will. Forced marriage takes place when there is an absence of free and full consent of one or both parties, but the parties are forced to get married under duress, including physical and emotional pressure, usually from their families. Every year, hundreds of young people in Britain, both male and female, are forced into marriage against their will. In the UK, forced marriage is considered a serious abuse of human rights and, when it involves a child, a form of child abuse. A child marriage is always a forced marriage as children lack the capacity to make a fully informed and consensual decision to marry or not. According to the organisation Forward UK, "Child marriages must be viewed within a context of force and coercion, involving pressure and emotional blackmail and children that lack the choice or capacity to give their full consent."

### ***Reasons for Forced Marriages***

There are a number of reasons that parents or families may choose to force their children into unwanted marriages, such as:

- A desire to maintain 'family honour' in terms of ensuring that young people marry into a particular, approved family or community
- To control unwanted behaviour in a child (such as perceived promiscuity)
- To protect cultural or religious ideals which are misguided or out of date
- When homosexuality in a child or young person is not accepted by his or her parents, and they then force the child or young person into a heterosexual marriage
- To strengthen family or community links, or to ensure that land or assets remain within the family.
- For immigration and citizenship purposes to enable a family or community member living outside the UK to move to the UK on a permanent residence visa.

There are no religious or cultural justifications for forced marriage.

According to the Foreign and Commonwealth Office's Forced Marriage Unit (FMU), most cases of forced marriage that take place in the UK or involve UK nationals involve South Asian families, although there have also been reported incidents from East Asian families, as well as Middle Eastern, European and African families.

A child who is forced into marriage is at risk of significant harm through physical, sexual or emotional abuse. Forced marriage can have a negative impact on a child's health and development, and can also result in sexual violence including rape. If a child is forced to marry, he or she may be taken abroad for an extended period of time which could amount to child





abduction. In addition, a child in such a situation is likely to be taken out of school so as to ensure that they do not talk about their situation with their peers.

### ***Referral to Social Services or Police***

Information about a possible or actual forced marriage may come from the child/young person concerned or a friend or relative. It may also become apparent in relation to other family issues, such as domestic violence, self-harm, teenage pregnancy, child abuse or neglect, family conflict or when a child/young person has gone missing. Any member of staff who has reason to believe that a child/young person may be at risk of forced marriage, or has been subject to forced marriage, whether or not the child/young person is thought currently to be in this country, must immediately refer to Social Services or the Police. Where the Police are the first to be informed, they are to refer to Social Services without delay.

### ***Warning Signs***

Potential warning signs for staff:

- a sudden drop in performance, aspirations and motivation.
- a student coming to school but then truanting from lessons. Often young people at risk of a forced marriage are living in virtual imprisonment so school time is their 'free' and 'unsupervised' time to do ordinary adolescent activities that others do on weekends with their friends.
- considerable absence authorised by parents for reasons of sickness and family commitments or other commitments overseas. There could be a history of extended family holidays overseas often interrupting the school term.
- history of older siblings also leaving education early and marrying early.
- self-harming, anxious and depressive behaviour including anorexia, mental health disorders, self cutting, substance abuse, shoplifting, very withdrawn behaviour, very low self-esteem and difficulties in expressing own needs and making decisions.
- the student seems to be subject to excessive restriction and control. This can include:
  - Not being allowed to attend extra-curricular or after school activities.
  - Being accompanied to and from school and during lunch-breaks - never being left alone.
  - Being excessively worried about being seen in the company of the opposite sex or of different racial and religious groups.

Connexions staff may identify children who are at risk of, or subject to, forced marriage.

Contact: The Forced Marriage Unit Room, G/55 Old Admiralty Building, Whitehall SW1A 2PA  
Telephone: 020 7008 0135/0230/8706 Email: fmu@fco.gov.uk.

### **Upskirting**

This is when someone takes a picture under a person's clothing without them knowing. This is now a criminal offence. Whilst we do not allow mobile phones in class, mobile devices are used in some lessons and staff must be vigilant when devices are in use.



## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any Deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.



## SECTION 3

### **Allegations against staff, volunteers and the Head Teacher**

This section of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. It refers to Part 4 of KCSIE (September 2020).

#### *Duties as an employer and an employee*

All school staff, volunteers and the Head Teacher should take care not to place themselves in vulnerable positions and are responsible for their own actions and behaviour and should avoid conduct which would lead any reasonable person to question their motivation and intentions.

It should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) has:

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

This section relates to members of staff who are currently working in school regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

Cases where a supply teacher has an allegation raised against them must be dealt with properly. This should be referred to the LADO. The Governing body should communicate with the agency and consider the appropriateness of suspending the supply teacher or redeploying them. The agency should be fully involved with the school throughout the procedure. Policies regarding safeguarding should be shared with the agency before a working relationship is established with them.

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

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

The Chair of Governors will ensure there is effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.



If an allegation of abuse is made against a member of staff or volunteer, the person receiving the allegation must take it seriously and immediately report it in the first instance to the Head Teacher (or the most senior person if the Head Teacher is not present). If the allegation refers to the Head Teacher, the matter will be referred **immediately** to the Chair of Governors and the Governor responsible for safeguarding issues **without notifying the Head Teacher first**. If the allegation is against the Chair of Governors, the allegation should be reported to the Local Authority Designated Officer (LADO) **without notifying the Chair first**. The procedures for dealing with allegations need to be applied with common sense and judgement.

The quick resolution of any allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. The school will not undertake its own investigations of allegations without prior consultation with the local authority designated officer (LADO), or in serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the LADO can be held informally and without naming the school or the individual. The LADO may be contacted through the relevant board as previously listed.

### *Contacting the local authority*

In the first instance the Head Teacher, or where the Head is the subject of an allegation the Chair of Governors, should immediately discuss the allegation with the designated officer(s) at the local authority.

The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer(s) may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children.

The LADO will be communicate with and agree a course of action. Before this takes place the school will gather the outline information to establish the allegation, including considering:

- are there any witnesses
- do we have CCTV footage
- was the individual at school at the time of the allegation
- what contact did the individual have with the child

The school will consider:

- applying a common sense approach
- dealing fairly, consistently and quickly
- will always consider the needs of the child

The school will agree with the LADO how and when to communicate with the individual regarding the allegation and who should be present. Where appropriate a strategy will be put in place for the child which could involve social care. Where a case leads to no further action the LADO and the staff member leading the case will record the decision and the justification for it. They will also agree what should be conveyed in writing to the individual. If a concern or



allegation does not meet threshold the School Governors will consider what action needs to be taken to protect the child.

Where further investigations need to take place the LADO and staff member managing the case will decide how to proceed. The case lead will ensure that matters are dealt with swiftly and review regularly as the case progresses. The first review should take place no later than four weeks after the case is initiated.

### ***Contacting the police***

There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Where there is no such evidence, the case manager should discuss the allegations with the designated officer(s) in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement reached on what should be put in writing to the individual concerned and by whom.

The case manager should then consider with the designated officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

### **Unsubstantiated and false allegations**

Where it is concluded that there is insufficient evidence to substantiate an allegation, the chair of the strategy meeting should prepare a separate report of the enquiry and forward this to the designated senior officer and Chair of Governors to enable them to consider what further action, if any, should be taken.

A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

False allegations are rare and may be a strong indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the school, in consultation with the LADO, should refer the matter to social services to determine whether the child is in need of services, or might have been abused by someone else.



### ***Informing the accused person***

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

### ***Strategy discussion***

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance 'Working together to safeguard children'.

If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Wherever possible, a strategy discussion should take the form of a face-to-face meeting and should:

- Decide whether there should be a police investigation and consider the implications
- Consider whether any parallel disciplinary process can take place and agree protocols for sharing information
- Consider the current allegation in the context of any previous allegations or concerns
- Where appropriate, take account of any entitlement by staff to use reasonable force to control or restrain children (see updates to the latest DfE advice)
- Consider whether a complex abuse investigation is applicable
- Plan enquiries if needed, allocate tasks and set timescales
- Decide what information can be shared, with whom and when
- Ensure that arrangements are made to protect the child(ren) involved and any other child(ren) affected, including taking emergency action where needed
- Consider what support should be provided to all children who may be affected
- Consider what support should be provided to the member of staff and others who may be affected
- Ensure that all investigations are sufficiently independent
- Make recommendations where appropriate regarding suspension, or alternatives to suspension
- Identify a lead contact manager within each agency
- Agree protocols for reviewing investigations and monitoring progress by the designated officer(s), having regard to the target timescales
- Consider reports for consideration of barring
- Consider risk assessments to inform the employer's safeguarding arrangements.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) should discuss the next steps with the case manager. In those circumstances,



the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the designated officer(s) should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff. In other circumstances, such as the nature or complexity of the allegation, the school will require an independent investigator.

### ***Support for employees***

The school has a duty of care to its employees. The Chair of Governors should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police.

The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice if necessary. The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

### ***Support for a child or children***

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

### ***Liaising with the parents or carers of a child or children***

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.





Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002.

If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

### ***Suspension***

Suspension of the member of staff against whom an allegation has been made needs careful consideration and the Governing Body will not automatically suspend the individual concerned. However, it should be considered in any case where:

- There is cause to suspect a child is at risk of significant harm
- The allegation warrants investigation by the police
- The allegation is so serious that it might be grounds for dismissal

If a strategy meeting/discussion is to be held, or if children's social care services or the police are to make enquiries, the Chair of Governors and LADO will discuss the matter of suspension. Only the Chair of Governors, however, has the power to suspend an accused employee and cannot be required to do so by a local authority or the police.

If a suspended person is to return to work, the Chair of Governors and Head Teacher should consider what help and support might be appropriate (eg a phased return to work and/or move to a different area of the school) and also how best to manage the member of staff's contact with the child concerned, if still in the school.

In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school it will be necessary to immediately suspend that person from teaching pending the findings of the Teacher Regulation Agency's investigation.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). This should also include what alternatives to suspension have been considered and why they were rejected. Written confirmation should be sent within one working day giving as much detail as appropriate for the reasons for the suspension. The person should be informed at the point of their suspension who their named contact is for support within the organisation and provided with their contact details.

### ***Record keeping***

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information



from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

### ***Timescales***

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but should be achieved in all but truly exceptional cases. It is expected that most cases should be resolved within one month, and all but the most exceptional cases should be completed within 12 months. For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated safeguarding lead. In such cases, if the nature of the allegation does not require formal disciplinary action, the school should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

### ***Information sharing***

In a strategy meeting or the initial evaluation of the case, all agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the employer should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

### ***Disciplinary Action***

The designated safeguarding lead, case manager and the Chair of Governors should discuss whether disciplinary action is appropriate in cases where:

- It is clear at the outset or decided by a strategy meeting that a police investigation or LA children's social care enquiry is not necessary;
- The school is informed by the police or the Crown Prosecution Service that a criminal investigation and any subsequent trial is complete, or that an investigation is to be closed without charge, or a prosecution discontinued.



The discussion should consider any potential misconduct or gross misconduct on the part of the member of staff, and take into account:

- Information provided by the police and/or Children and Families' First Response Team;
- The result of any investigation or trial;
- The different standard of proof in disciplinary and criminal proceedings. In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. In these circumstances, the designated officer(s) and school should act jointly with the providing agency, if any, in deciding whether to continue to use the person's services, or provide future work with children, and if not, whether to make a report for consideration of barring or other action.

The aim of an investigation is to obtain, as far as possible, a fair, balanced and accurate record in order to consider the appropriateness of disciplinary action and/or the individual's suitability to work with children. Its purpose is not to prove or disprove the allegation.

The investigating officer should aim to provide a report within ten working days. On receipt of the report the Chair of Governors should decide, within two working days, whether a disciplinary hearing is needed. If a hearing is required, it should be held within 15 working days.

### ***Resignations and Compromise Agreements***

The fact that a person resigns or ceases to provide services will not prevent an allegation being followed up according to these procedures. A referral to the DBS must be made if the criteria is met. It may be difficult to reach a conclusion in these circumstances and it may not be possible to impose disciplinary sanctions but it is important to reach and record a conclusion.

Compromise Agreements will not be used in cases of allegations of abuse.

### ***Referral to the Disclosure and Barring Service (DBS)***

The school will report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used and the DBS referral criteria are met. For the sake of clarity, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. The report to the DBS should include as much evidence about the circumstances of the case as possible. The Head Teacher has a legal duty to respond to requests from the DBS for information. There is a legal requirement for the school to make a referral to the DBS if an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.

### ***Referral to the Teacher Regulation Agency***

The school is also under a duty to consider making a referral to the Teacher Regulation Agency where a teacher has been dismissed (or would have been dismissed had he/she not resigned)



and a prohibition order may be appropriate. The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Where a referral has been made to the DBS, it is not necessary for a referral also to be made to the Teacher Regulation Agency, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a Teacher Regulation Agency referral.



## SECTION 4

### **Prevent Statement**

The aim of the Prevent Statement is to create and maintain a safe, healthy and supportive learning and working environment for our pupils, staff and visitors alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for pupils. We further recognise that if we fail to challenge extremist views we are failing to protect our pupils from potential harm. As such the Prevent agenda will be addressed as a safeguarding concern. The Prevent Statement applies to everyone working at or attending the school.

It confers responsibilities on the Governors, school staff, pupils, agency staff and volunteers, contractors, visitors, consultants and those working under self-employed arrangements. The school has adopted the Prevent Duty 2015 in accordance with legislative requirements.

Indicators of vulnerability of children and young people to radicalisation may include:

- discomfort about their place in society;
- low self-esteem;
- involvement with a new and different group of friends – sometimes older;
- accessing or possessing extremist literature;
- accessing violent extremist websites, especially those with a social networking element;
- rejection of civic life.

We will endeavour to incorporate the relevant duties so as not to:

- Stifle legitimate discussions, debate or student engagement activities in the local community;
- Stereotype, label or single out individuals based on their origins, ethnicity, faith and beliefs or any other characteristics protected under the Equality Act 2010.

### ***Purpose***

We aim to encourage working towards a common vision and sense of belonging by all - a community in which the diversity of everyone's backgrounds and circumstances is appreciated and valued, a community in which similar life opportunities are available to all, and a community in which strong and positive relationships exist and continue to be developed in the workplace, in schools and in the wider community.

The purpose of this Statement is to:

- Ensure an awareness of Prevent within the school.
- Provide a clear framework to structure and inform our response to safeguarding concerns, including a supportive referral process for those who may be susceptible to the measures of extremism.
- Embed British Values into the curriculum and ways of working.
- Recognise current practice that contributes to the Prevent agenda.
- Identify areas for improvement.

In order to fulfil the Prevent Duty 2015, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting



children from the risk of radicalisation should be seen as part of the school's wider safeguarding duties, and is similar in nature to protecting children from other harms (eg drugs, gangs, neglect etc), whether these come from within their family or are the product of outside influences.

### *National Guidance and Strategies*

Prevent is one of four strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Early intervention is at the heart of Prevent in diverting people away from being drawn into terrorist activity through radicalisation.

The National Prevent Strategy objectives are:

- **Ideology** - To respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- **Individuals** - To prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- **Institutions** - To work with sectors and institutions where there are risks of radicalisation which we need to address.

Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health.

The Government has created a system of 'threat levels' that represents the likelihood of a terrorist attack in the near future. The current threat level from international terrorism in the UK is severe, which means that a terrorist attack is highly likely.

### *Objectives*

Our Prevent Statement has five key objectives:

1. To promote and reinforce shared values, including British Values (including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs); to create space for free and open debate; and to listen and support the learner voice.
2. To breakdown segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding; and to engage all pupils in playing a full and active role in wider engagement in society.
3. To ensure student safety and that the school is free from bullying, harassment and discrimination.
4. To provide support for pupils who may be at risk of radicalisation, and appropriate sources of advice and guidance.
5. To ensure that pupils and staff are aware of their roles and responsibilities in preventing violent and non-violent extremism.



## ***Definitions***

The following are commonly agreed definitions within the Prevent agenda:

- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

## ***Aims***

To create and maintain a school ethos that upholds core values of shared responsibility and wellbeing for all pupils, staff and visitors whilst promoting respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building understanding of the issues and confidence to deal with them through staff training, UNICEF RRS (Rights Respecting Schools) and community activities.
- Deepening engagement with local faith groups through our RPS programme.

## ***Teaching and Learning***

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of pupils by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum.
- Promoting wider skills development such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights.
- Use of external programmes or groups to support learning while ensuring that the input supports school goals and values.





### ***Risk Assessment***

The school assesses the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. It is important that staff understand these risks so that the school can respond in an appropriate and proportionate way. The school is aware of the risk of online radicalisation through the use of social media or the internet. Staff are trained to be alert to changes in children's behaviour that could indicate that they may be in need of help or protection. Although the Prevent Duty does not require the school to carry out unnecessary intrusion into family life, staff must take action if they observe behaviour of concern.

### ***Referral and Intervention***

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the young person supports terrorism and/or extremism, must be reported to the Designated Safeguarding Lead immediately. Some concerns may have a security dimension to them and so liaison with the Police may form an early part of an investigation. The Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. Department for Education dedicated helpline It may be necessary to make a referral to the Channel programme. Channel is a programme that focusses 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 the school to make referrals if staff are concerned that an individual might be vulnerable to radicalisation. Anybody can make a referral – not just the Designated Safeguarding Lead.

If there is a risk of immediate harm or danger to a child or young person, you should contact the Police via 999 or the Police Anti-Terrorist Hotline via 0800 789 321.

### **Whistleblowing**

All employees have a duty to report any fraud, misconduct, safeguarding issue or wrongdoing within the School.

The School therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. The School will ensure such matters are investigated appropriately and that no employee or individual who raises such a concern will be discriminated against, victimised or treated less favourably for doing so, in line with the Public Interest Disclosure Act 1998

All information relating to any disclosures will be retained in line with the General Data Protection Regulations 2018.

This policy applies to all employees of the School and individuals who work with the School.

### ***What is Whistleblowing?***

Whistleblowing is when an employee is protected for making a 'qualifying disclosure' of believed potential wrongdoing.



The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that the following is being, has been, or is likely to be, committed:

- a criminal offence
- inappropriate behaviour by another member of staff towards a pupil (especially in EYFS)
- a safeguarding concern about a pupil that has been raised with the DSL/ Head Teacher or Chair of Governors and has not been followed up in the correct manner with the local authority
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- deliberate concealment of any of the above

It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.

The member of staff has no responsibility for investigating the matter - it is the School Governors' responsibility to ensure that an investigation takes place.

The member of staff who makes such a protected disclosure has the right not to be dismissed, or subjected to victimisation, because he/she has made the disclosure.

The School encourages members of staff to raise their concerns under this procedure in the first instance. If a member of staff is not sure whether to raise a concern, he/she should discuss the issue with the Deputy Head or Head Teacher.

For a qualifying disclosure to be a protected disclosure, you need to make it to the right person and in the right way. There are a number of methods by which you can make a protected disclosure but the School always encourages all employees to raise any disclosure internally in the first instance. Employees are encouraged to raise any qualifying disclosures by following the disclosure procedure set out below.

If the employee's concern relates to a breach of the contract of employment then this should be done through the School's grievance procedure.

### ***Employee and Employer Responsibilities***

The following responsibilities should be taken by employees;

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature of which they become aware.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.



- Nobody will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern.
- Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence.
- Any member of staff who has any concerns about the behaviour of another member of staff (or volunteer) should raise them with the Head Teacher. The NSPCC is available for staff who feel unable to raise an issue with either the Head Teacher or a school Governor. This line is available Monday- Friday, 8:00am to 8:00pm. (0800 028 0285, help@nspcc.org.uk)
- If misconduct is discovered as a result of any investigation under this procedure the School's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence. If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of the School's disciplinary procedure.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as Senior Management, employees should not agree to remain silent. They should report the matter to a School Governor.
- If an Employee believes there has been a breach of their own contract of employment, or believes there has been or will be a breach, they should refer to the School's Grievance Policy accordingly.
- The School recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the School reserves the right to make such a referral without the employee's consent.

### ***Procedure to make a disclosure***

The procedure applies to all permanent and temporary employees along with third parties such as agency workers, consultants, and contractors and anyone else who performs a function in relation to the School.

1. If you wish to make a qualifying disclosure, you should, in the first instance, report the situation in writing to the Head Teacher, setting out in details the nature of your disclosure. If you do not wish to contact the Head Teacher instead contact a School Governor.

Such disclosures should be made promptly so that investigation may proceed and any action taken expeditiously.

2. All qualifying disclosures will be treated seriously. The disclosure will be promptly investigated and, as part of the investigatory process, you will be interviewed and may be asked to provide a written statement setting out the nature and details of your qualifying disclosure and the basis for it. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, the School must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the disclosure. The School reserves the right to arrange for another SLT member to conduct the investigation other than the person with whom the employee raised the matter.



3. Once the investigation has been completed, you will be informed in writing of the outcome and the School's conclusions and decision as soon as possible. The School is committed to taking appropriate action with respect of all qualifying disclosures which are upheld.
4. The employee will not be penalised for raising a qualifying disclosure even if it is not upheld, unless the complaint was both untrue and made in bad faith.
5. Once the School's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained.
6. If, on conclusion of the above, the employee believes that appropriate action has not been taken, the matter should be reported externally such as LADO, ISI, health and safety executive, DfE etc. in good faith in accordance with the provision of the Act. The Act sets out a number of prescribed external bodies or persons to which qualifying disclosures may be made. It is not acceptable for staff members to report matters to the media. However, the School always encourages all employees to raise their concerns directly in the first instance, rather than externally. This enables issues to be dealt with promptly and speedily.

### ***Communication and Implementation***

This Policy will be made available to all Employees. All members of the School have a responsibility to raise such concerns and to ensure they are acting in good faith to protect the interests of School and its valued employees, at all times.

### ***Staff Training***

Whistleblowing training is conducted at staff induction when a new member of staff joins the school. The staff are regularly reminded at meetings or at least at the start of each school year that as a school we have an open and honest procedure for whistleblowing which must be adhered to.

### **E-Safety and Online Safety**

Our policy on E-Safety is a stand-alone document. We take our responsibilities to educate our pupils to stay safe when using all digital technologies appropriate to their age very seriously. Children will receive guidance in PHSEE, computing and critical thinking lessons as well as through assemblies and during national online safety day. All lessons will be age appropriate.

Online safety covers:

- Content - being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views
- Contact - being subjected to harmful online interaction with others; for example commercial advertising as well as adults posing as children, or online bullying.
- Conduct - personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying



### ***Use of Mobile Phones and Portable Technology***

(referenced to our Staff Policy on Mobile Phone, Technology, Security and Electronic Communications)

- Mobile phones are not permitted for pupils in school unless Y6 pupils have written permission from parents to commute to and from school unescorted in which case their mobile phone must be deposited with the school office upon arrival at school.
- Staff mobile phones may only be used in the staff room or school reception area whilst pupils are on premises
- Staff in the main school and EYFS may not use their own devices including tablet computers for recording pupils' achievements or to record pupils' activity during trips photographically. All images must be taken on school devices and then downloaded onto the school's central system as soon as practicable and deleted from the device. Parents have consent to photograph their children in official school events such as productions or fixtures on the strict condition that these are for personal use only and may not be published on the internet including social networking sites.
- Parents are asked for permission for their child's images to be used on the school website. No image is used with any reference to personal identity on the website or in the school prospectus.
- Staff should adhere to the information contained in the Staff Use of Social Media and Networking Sites Policy. Under no circumstances should staff engage in any form of social networking with pupils or any way that will compromise their status as role models or bring the school into disrepute.

### **Physical Intervention/Positive Handling**

Our policy on physical intervention/positive handling by staff is set out in our Behaviour Policy. It refers to the DfE guidance on positive handling strategies (2001) and complies with the Department for Education guidance 'Use of reasonable force: Advice for Headteachers, staff and governing bodies 2012. The Education Act 2002 (Section 4) clarified the position about the use of physical force by staff.

Staff must only ever use physical intervention as a last resort, eg when a pupil is endangering him/herself or others. At all times it must be the minimal force necessary to prevent injury to another person. Contact to control or manage a pupil could be to guide them to safety or prevent injury. All learning support, lunchtime staff, admin staff, club supervisors, peripatetic music staff and the caretaker are authorised by the Chair of Governors to control or restrain pupils only when necessary.

We understand that physical intervention of a nature which causes injury or distress to a pupil may be considered under child protection or disciplinary procedures. Planning a positive and proactive support can reduce the occurrence of risky behavior and the need to restrain a child.

### ***Corporal Punishment***

The law forbids a teacher to use any degree of physical contact which is deliberately intended to punish a pupil, or which is primarily intended to cause pain or injury or humiliation. Corporal punishment is not allowed.



### ***Physical Restraint***

Teachers and other authorised staff may use such force as is reasonable (ie using no more force than is needed) in all circumstances to prevent a pupil from doing, or continuing to do, any of the following:

- Committing a criminal offence (including behaving in a way that would be an offence if the pupil were not under the age of criminal responsibility);
- Injuring themselves or others;
- Causing serious damage to property (including the pupil's own property);
- Engaging in any behaviour prejudicial to maintaining good order and discipline at the School or among any of its pupils, whether that behaviour occurs in a classroom during a teaching session or elsewhere;
- Anything that would reasonably be regarded as exceptional circumstances. This applies when a teacher, or other authorised person, is on the school premises and when he or she has lawful control or charge of the pupil concerned elsewhere, e.g. on a field trip or other authorised out of school activity. Any occasion where physical intervention is used to manage a child's behaviour should be recorded and parents should be informed about this on the same day.

### ***Practical Considerations***

Before intervening physically a teacher should, where practicable, tell the pupil who is misbehaving to stop and what will happen if he/she does not. The teacher should continue to communicate with the pupil throughout the incident and should make it clear that the physical contact will stop as soon as it ceases to be necessary. In some circumstances, a teacher should not intervene without help (unless it is an emergency) e.g. when dealing with an older pupil, or a physically large pupil, or if the teacher believes he or she may be at risk of injury. In these circumstances the teacher should remove other pupils who may be at risk and call for assistance from colleagues or where necessary call the police. Events will be recorded and signed by a witness.

### ***Types of Incidents***

There are a wide variety of situations in which reasonable force might be appropriate, or necessary, to control or restrain a pupil. They will fall into three broad categories:

1. Where action is necessary in self-defence or because there is imminent risk of injury e.g. a pupil attacks a member of staff or another pupil;
2. Where there is a developing risk of injury, or significant damage to property e.g. pupils are fighting, misusing dangerous materials, vandalising property, running in the corridor in a way that may cause an accident or a pupil tries to leave the School and so is at risk;
3. Where a pupil is behaving in a way that is compromising good discipline e.g. a pupil persistently refuses to obey an order to leave the classroom or behaves in a way which seriously disrupts the classroom.

### ***Application of Force***

Physical intervention can take several forms. It might involve staff:

- physically interposing between pupils;





- blocking a pupil's path
- holding
- pushing
- pulling
- leading by the hand or arm
- shepherding a pupil away by placing a hand in the centre of the back;
- (in extreme circumstances) using more restrictive holds.

In exceptional circumstances, where there is an immediate risk of injury, a member of staff may need to take any necessary action consistent with the concept of 'reasonable force': for example to prevent a young pupil running off the pavement onto a busy road or preventing a pupil hitting someone or throwing something. In other circumstances staff should not act in a way that might reasonably be expected to cause injury. Staff should always avoid touching or holding a pupil in a way that might be considered indecent.

### ***Physical Contact with pupils in other circumstances***

There are some occasions where physical contact may be proper or necessary. Some physical contact may be necessary during PE lessons, sports coaching or Design Technology or if a member of staff is giving first aid. Young children and children with special needs may need staff to provide physical prompts or help. Touching may also be appropriate where a pupil is in distress and needs comforting. Teachers will use their own professional judgement when they feel a pupil needs this kind of support. There may be some children for whom touching is particularly unwelcome. This may be because of their cultural background or because they have suffered abuse. Staff will be informed if this is the case.

### ***Recording Incidents***

It is important that there is a detailed, factual, written report of any occasion where it has been necessary to use force or restraint (except minor or trivial incidents). Immediately following any such incident the member of staff concerned should tell the Head Teacher or a member of the SLT and provide a written report as soon as possible afterwards on an incident form.

That should include:

- the name(s) of the pupil(s) involved and when and where the incident took place;
- the names of any staff or pupils who witnessed the incident;
- the reason that force was necessary;
- how the incident began and progressed, including details of the pupil's behaviour, what was said by each of the parties, the steps taken to defuse or calm the situation, the degree of force used, how that was applied and for how long;
- the pupil's response, and the outcome of the incident;
- details of any injury suffered by the pupil, another pupil or a member of staff and of any damage to property.

Staff may find it helpful to seek advice from a senior colleague or a representative of their professional association when compiling a report. They should also keep a copy. Incidents





involving the use of force can cause parents of the pupil involved great concern. It is always advisable to inform parents and give them the opportunity to discuss it. Any incident requiring restraint of a child will be recorded by The Head or Deputy Head in the 'Restraint and Physical Intervention Record Book' kept in The Head's office.

### ***Complaints around physical handling***

Involving parents when an incident occurs, plus a clear policy about physical contact with pupils that staff adhere to, should help to avoid complaints from parents. If, however, a parent does submit a formal complaint this will be dealt with via school procedures for dealing with allegations against staff. This may lead to an investigation, either under disciplinary procedures, or by the Police and Social Services under child protection procedures.

### **Intimate Care**

Intimate care can be defined as care tasks of an intimate nature, associated with bodily functions, body products and personal hygiene which may involve staff touching parts of the child's body. Examples include care associated with toileting and menstrual management as well as more ordinary tasks such as help with washing. All children have a right to safety, privacy and dignity when contact of an intimate nature is required (e.g. assisting with toileting or removal of wet/soiled clothing). A care plan will be drawn up and agreed with parents if a child requires intimate care on a regular basis.

Where an incident that requires intimate care takes place, members of staff will:

- Treat children with sensitivity and respect, so that their experience of intimate care is a positive one
- Ensure privacy appropriate to the child's age and the situation
- Allow the child to care for him/herself as far as possible
- Be aware of, and responsive to, the child's reactions
- When carrying out intimate care away from the School remember the main issues of privacy and safety
- Have a high awareness of child protection issues and undertake their duties in a professional manner
- Consider any cultural and religious sensitivities

For children who have wet or soiled themselves (EYFS, Year 1 and Year 2), staff should change children in order to minimise discomfort and embarrassment. The procedures are as follows:

- Staff will change the wet or soiled clothing as soon after the accident as possible
- The changing will take place discretely in the toilet area relevant to the group or in the Medical Room
- Staff are regularly trained regarding child protection and health and safety, (including manual handling), and are fully aware of infection control, including the need to wear disposable aprons and gloves to protect their hands and to minimise contact with intimate areas
- Wipes will be used to ensure the child is clean
- Wet or soiled clothing will be stored in a plastic bag to go home with the child
- The staff will monitor wet or soiled clothing changes and record each occurrence



- If a child becomes unduly distressed or embarrassed by the experience, the staff concerned should comfort and reassure him/her, talk through what they are doing and ensure that the change is completed swiftly. Every effort should be made to minimise embarrassment and discomfort in accordance with general Child Protection Procedures.
- Staff will work in partnership with the child's parents or carers, to discuss their needs, routines or preferences if necessary.
- Information regarding intimate care is treated as confidential and communicated in person, by telephone, or by sealed letter, not through the home/school diary, or by any other method which is not confidential.
- All those members of staff working with children will have enhanced DBS disclosure and clearance. Work experience pupils and volunteers who do not have an enhanced DBS disclosure are not allowed to provide intimate care.
- It is not always practicable from the point of view of staffing resources for there to be two members of staff involved with a child needing intimate care unless for health and safety reasons e.g. with a child who is ill or difficult to move or handle. The best interests of the child need to be considered in making such decisions. Whilst the presence of two people may be seen as providing protection against a possible allegation of abuse against a member of staff, it further erodes the privacy of the child. Parents are aware that staff will normally change the children on their own to maintain the required staffing ratios for the rest of the group, however there is always another member of staff nearby when intimate care is being undertaken on a one-to-one basis. Staff should make their intention and purpose known to other staff and to the child concerned before commencing intimate care.
- Should a child need thorough cleaning, the child's parent or carer may be invited to come to school to change their child themselves.

### **Safer Recruitment**

We ensure robust recruitment practices are always followed (see Safer Recruitment Policy (18a)). Identity checks will be carried out at the beginning of the interview process. All recruitment includes an enhanced DBS, identity, barred list check, prohibition from teaching check, section 128 check, reference checks, medical and qualification and disqualification from childcare checks (where appropriate) for all teaching and non-teaching staff and these arrangements are made to all those connected to the school in accordance with those required by the Government and Independent School standards regulations.

The majority of staff working in school will be in a regulated activity and will therefore require an enhanced DBS which includes barred list information. The level of DBS certification will depend on the role which is being offered. This will apply to both paid and unpaid employment. The Governors will act to ensure that checks and evidence has been carried out before employment commences. Employment of a management role will require additional checks under prohibition section 128 before the appointment is confirmed.

Staff will be employed as required by the statutory requirements of the Single Central Record including DBS checks and compliance with Independent Schools Standards Regulations. This record is co-ordinated by Mrs Best, School Administrator and overseen by a Governor.



There is a requirement to report to the Disclosure and Barring Service, within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used due to child protection issues. A referral will also be made to the TRA (Teaching Regulation Agency). In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible.

It is noted that from 12<sup>th</sup> October 2009, it is an offence under the Vetting and Barring Scheme (VBS) legislation:

- To knowingly employ (or take on as a volunteer) in a DBS regulated activity someone who is barred from such activity. (Note: this is in effect not a new requirement: it broadly replaces an offence under protection of children legislation which had existed since 2000. It does not require an employer to check whether a new starter is barred. At present, the requirement to check whether a new entrant to school staff is barred is the requirement (without an offence attached to it) which has been part of the school staffing regulations for several years.)
- Not to refer to the DBS details of anyone who is removed from regulated activity, or who leaves while under investigation for allegedly causing harm or posing a risk of harm.

### ***Volunteers***

Volunteers who help in school are given a volunteers pack which contains all relevant information. They are checked as to suitability and unless they have been DBS checked will not be left unsupervised at any point in their visit. Regular volunteers are DBS or Barred List checked. Depending on the activity the volunteer is involved with the level of supervision will be discussed with the person so as not to put the children or the adult at risk (see Volunteer Policy). At least one member of a recruitment panel will have received certification from the TRA (Teaching Regulation Agency) Safer Recruitment Programme.

### ***Visitors***

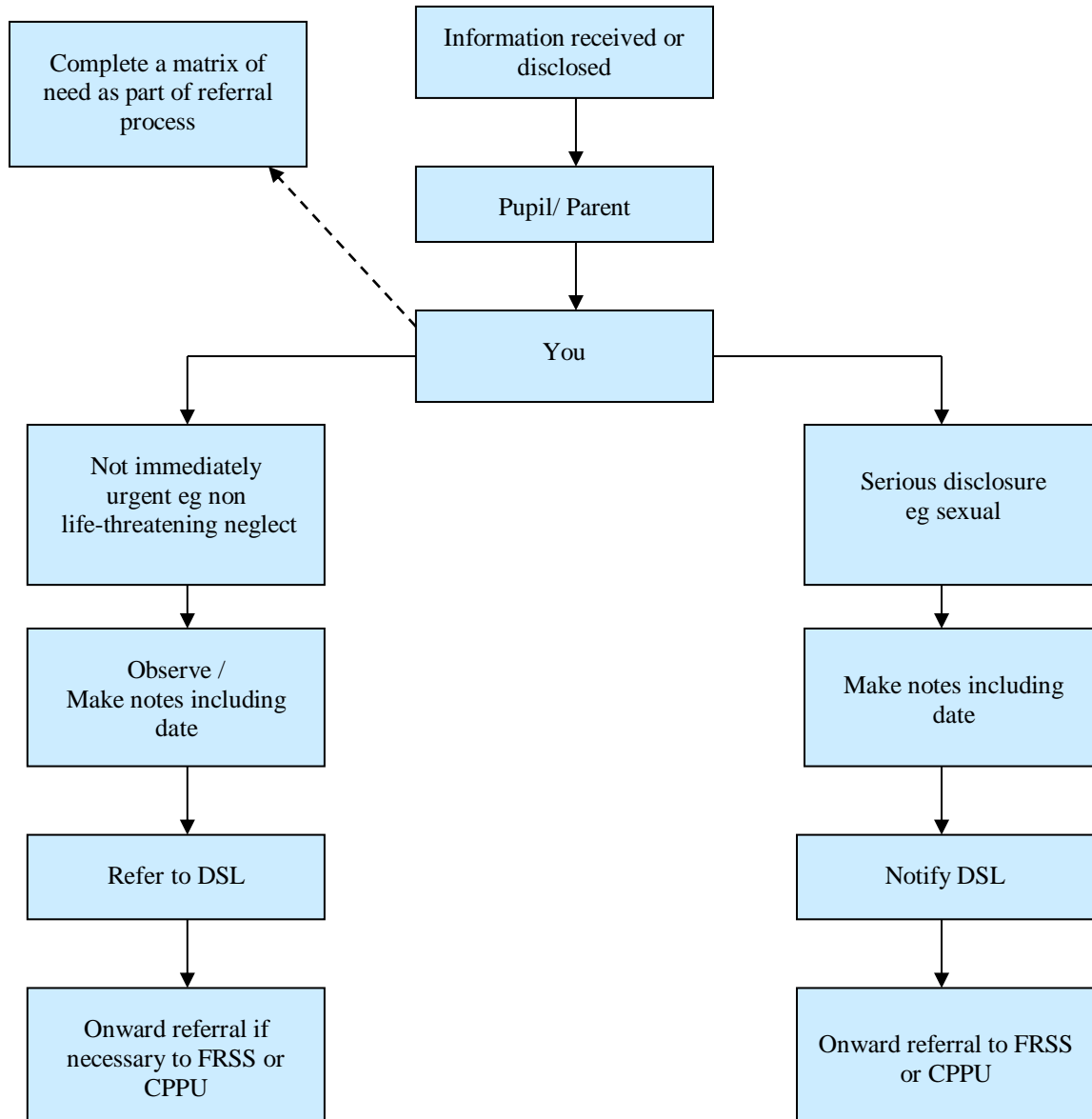
The school does not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). The Head Teacher or Deputy Head should use their professional judgment about the need to escort or supervise visitors.

Visiting speakers invited into school to talk to pupils in assemblies or in classes do not require DBS checks as long as they are supervised whilst in the school site. The school will ensure that they are suitable to be with children and that the subject matter is appropriate. Visitors conducting activities such as individual interviews with pupils that require them to be alone, must have enhanced DBS checks carried out.

Regulated activity is one where the adult is teaching, caring or supervising children in an unsupervised capacity.

## Appendix I

### Child Protection Procedures



➤ Redbridge (BHR – Barking, Havering, Redbridge):

- Telephone 9.00 am-5.00 pm 020 8708 3885
- Out of hours 020 8708 5897 (after 5.00 pm and at weekends)
- Lynton House, 255-259 High Road, Ilford, IG1 1NY
- email: CPATreferrals@redbridge.gov.uk

FRSS = Fast Response Social Services  
CPPU = Child Protection Police Unit  
NSPPC Helpline

➤ Waltham Forest Hub:

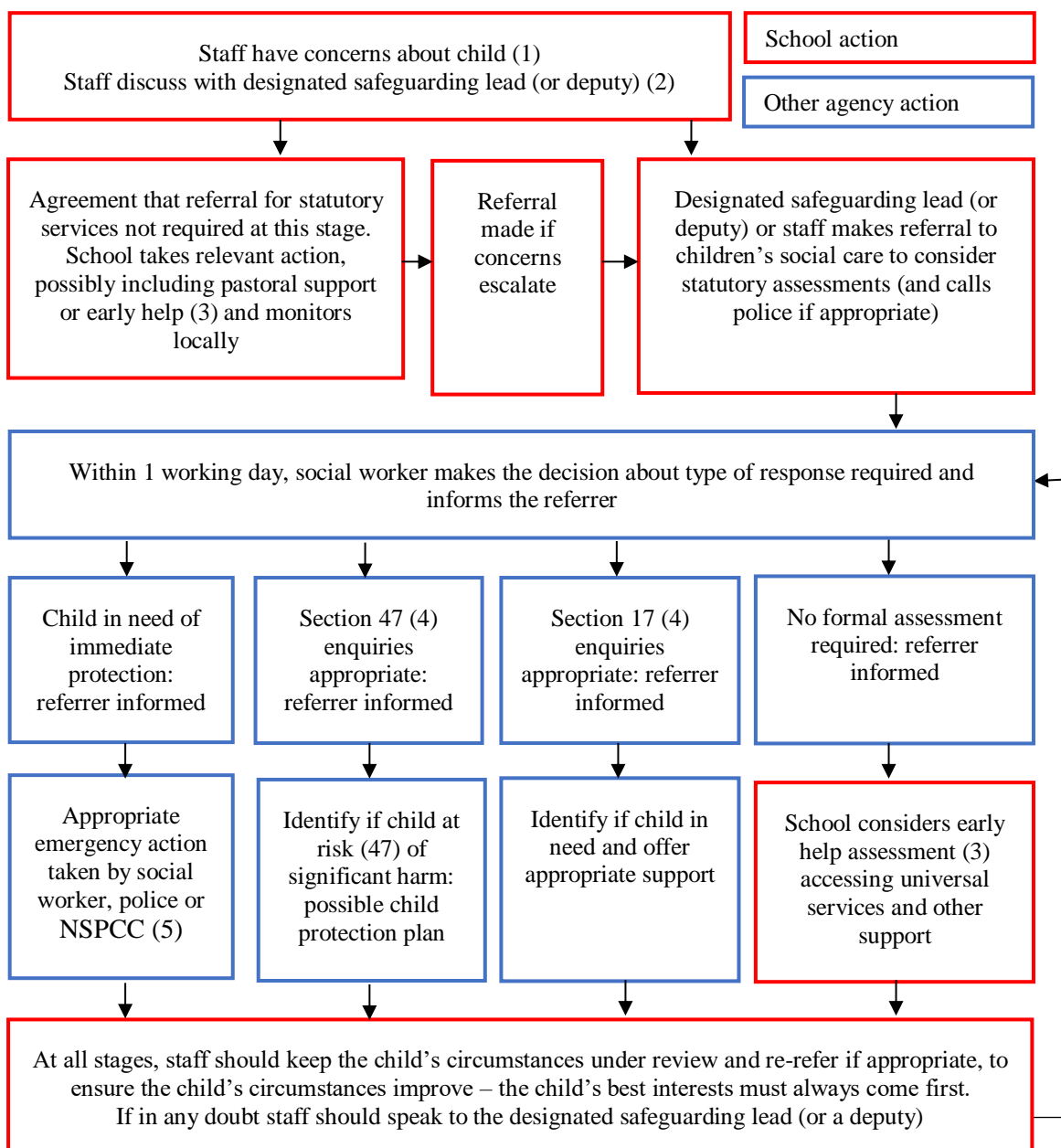
- Telephone 020 8496 2310 (Monday - Thursday 9am-5.15pm and Fri 9am-5pm)
- Mobile 020 8496 3000 (out of hours)
- email: MASHrequests@walthamforest.gov.uk

➤ Essex Safeguarding Children Board (ESCB):

- Telephone 0345 603 7627
- Out of hours 0345 606 1212 (after 5.00 pm and at weekends)
- Room C228, County Hall, Chelmsford, Essex CM1 1QH

## Appendix II

### Actions where there are concerns about a child



- (1) In cases which also involve an allegation of abuse against a staff member, see Part four of KCSIE.
- (2) If, for any reason, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.
- (3) Chapter 1 of 'Working together to safeguard children' provides detailed guidance on the early help process.
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 and section 47 assessment. Chapter 1 of 'Working together to safeguard children' provides detailed guidance on statutory assessments.
- (5) This could include applying for an Emergency Protection Order (EPO).