



FORT PITT
GRAMMAR SCHOOL

CHILD PROTECTION & SAFEGUARDING POLICY

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A **Beyond** ACADEMY
SCHOOLS TRUST

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1. Aims

- To provide a caring, positive, safe and stimulating environment that cares for the social, physical and moral development of the individual child. The Trust and Local Governing bodies take seriously their legal duty to safeguard and promote the welfare of the children and to work together with other agencies in so doing.
- To provide an environment, that includes on-line environments, in which students feel safe, secure, valued and respected; and where they feel confident and know how to approach responsible adults if they are experiencing abuse.
- To provide the support needed for vulnerable students via school-based teams putting appropriate plans in place and monitoring them effectively.
- Allow all staff to make informed and confident responses to specific time sensitive CP issues that include protection from parents or carers who fabricate or induce illness and organisations that seek to radicalise and recruit students into terrorist or far-right organisations.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children 2023](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children Partnership.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

This policy also complies with our funding agreement and articles of association. School procedures for safeguarding children will be in line with Medway Safeguarding Partnership, Child in Need/Child Protection Procedures and The Home Office Prevent Strategy and related government information which is regularly updated. A copy of 'Signs of Safety' is available for all staff to read and annual CP training is based on its guidance along with weekly updates on safeguarding issues within the school at briefings.



3. Definitions

Safeguarding and promoting the welfare of children means:

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

Children defined as: everyone under the age of 18.

Child protection refers to activities undertaken to prevent children suffering or being likely to suffer significant harm.

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

Victim/alleged perpetrator - are widely understood terms, but not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. We gauge what terms the child feels most comfortable with when talking of an incident.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities who may be considered to be more vulnerable in particular online as well as face to face.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Are young carers
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and members of the Local Governing Body in the school and is consistent with the procedures of Medway Safeguarding Partnership. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand Part 1 and 5 of [Keeping Children Safe in Education](#) (KCSIE), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff Code of Conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education



- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

5.2 The Designated Safeguarding Lead (DSL)

Our DSL is Andrew Ost. The DSL takes lead responsibility for child protection, children who are looked after, mental health and wellbeing along with wider safeguarding concerns. During term time, the DSL is available during school hours for staff to discuss any safeguarding concerns. The fully trained Safeguarding Team include Liz Burrows, Tammy Boozer, Mary-Anne Brown, Debbie Hemington, Becky Wiltshire-Hale and Catherine St Clair.

The Safeguarding Team can be contacted by external agencies via the school office by telephone or on the following email during out of office hours: Safeguarding@fortpitt.medway.sch.uk or the help@fortpitt.medway.sch.uk for students and parents.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Develop a culture of openness to disclose/refer concerns mindful of: "It happens here"
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL are set out in their job description.

5.3 The Local Governing Body

The Local Governing Body will approve this policy at each review and hold the headteacher to account for its implementation. The Local Governing Body will appoint a senior board level (or equivalent) lead (**Mr E Madueke**) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate. Governors should:

- Receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty (PSED)
- Seek assurance that where another body is providing services or activities, that they have appropriate safeguarding and child protection policies/procedures in place. This applies regardless of whether or not the children who attend these services/activities are children on the school roll/attend the college



- The child protection policy reflects that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school, or the consequences of doing so).

5.4 The headteacher

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

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

6. Confidentiality and anonymity

We recognise that all matters relating to child protection are confidential.

- The Headteacher or DCPCs will disclose any information about a child to other members of staff on a need-to-know basis only.
- All staff must be aware that they have a professional responsibility to share information in a timely manner with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep disclosed information confidential as this may compromise the child's safety or wellbeing.
- We will always undertake to share our intention to refer a child to Front Door Early Help with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the Children's Social Care Services, on this point.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, there's no definitive answer. This is because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
 1. Parents or carers should normally be informed (unless this would put the victim at greater risk)
 2. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
 3. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains



Regarding anonymity, schools should:

- Be aware of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report and any support for the children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

7. Recognising abuse and taking action

Staff, volunteers and members of the Local Governing Body must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is in immediate danger

- Tell the DSL or Safeguarding Team **immediately** either in person or via email.
- **Anyone can make a referral.** Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm.
- The school will refer serious Safeguarding Concerns to Front Door at Medway Safeguarding Partnership. This is a link to the GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

7.2 Action to be taken if a child makes a disclosure to you

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the student they have done the right thing in telling you.
- Do not promise to keep it a secret. Explain that you will have to pass this information on.
- Write up your conversation as soon as possible in the student's own words. Only factual.
- Sign and date the write-up and pass it on to the DSL

Staff will be aware that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).

7.3 Action to be taken if you discover that FGM has taken place or a pupil is at risk of FGM

FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse. **Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. This duty does not apply in cases where a pupil is **at risk** of FGM or FGM is **suspected**. These should be reported to the DSL as soon as is possible. No member of staff should not never examine pupils.

7.4 Action if you have concerns about a child (as opposed to a child being in immediate danger)

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below). You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.



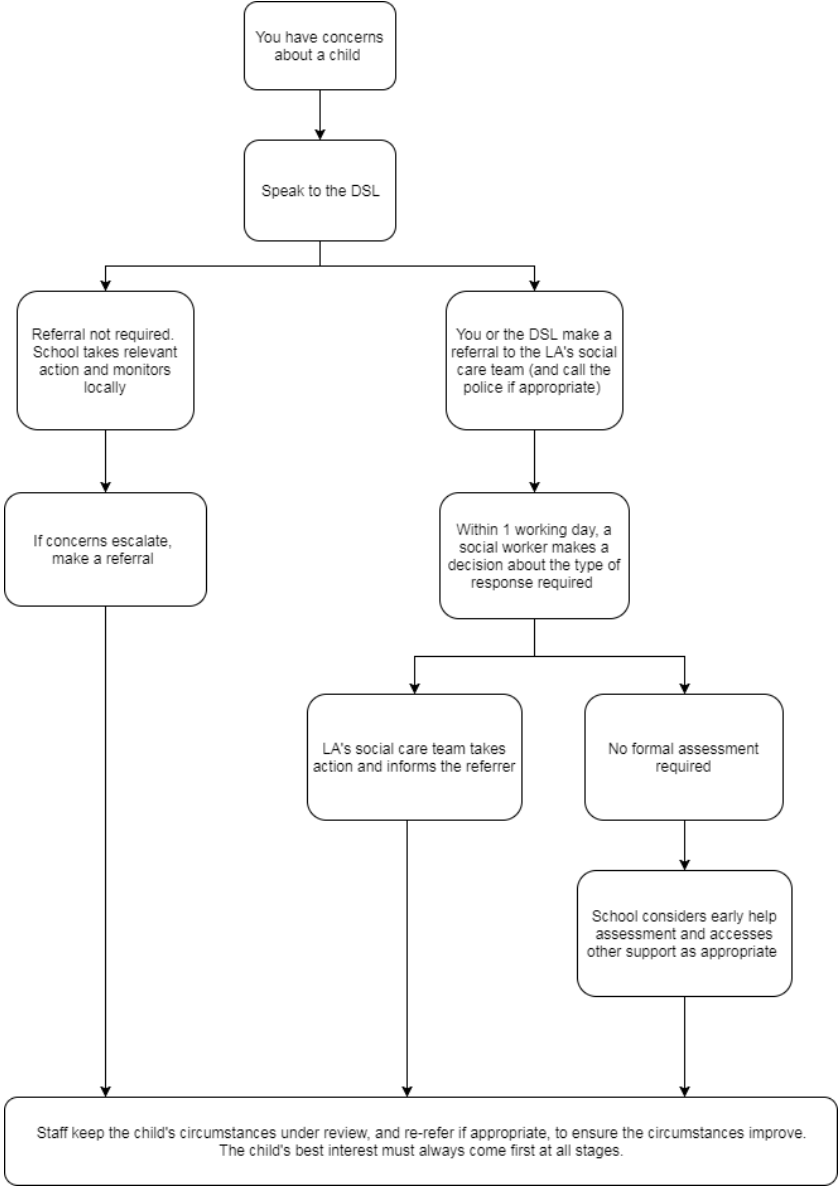
Early help /Family Solutions

The DSL or DDSLs will take on your referral and if early help is appropriate, they will liaise with other agencies and make referral in order to set up an inter-agency assessment as appropriate. The DSL will keep the case under constant review and the school will find out the social services response normally within five working days of the referral. This is in line with the udated “Working together to safeguard children 2023” guidance.

Referral

If you make a referral directly you must tell the DSL. The local authority will make a decision within 5 working days of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child’s situation improves.

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



7.5 If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above). Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the DSL and/or the Headteacher. If you have concerns about the headteacher, speak to the chair of the Local Governing Body. The headteacher/ the chair of the Local Governing Body /DSL will then follow the procedures set out in appendix 3, if appropriate. The DSL (or the chair of the Local Governing Body, in the case of a concern about the headteacher) will also inform the designated officer for the local authority. Any low-level concerns can be reported to line managers or directly to the Deputy Headteacher DSL and Wellbeing.

7.7 Allegations of child-on-child abuse made against other pupils

We recognise that children are capable of abusing other children (child-on-child abuse). Abuse will never be tolerated or passed off as "banter" or "part of growing up". Not challenging behaviour risks normalising abuse. Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious and/or could put pupils in the school at risk
- Involves physical harassment such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- Is violent and/or abusive in intimate relationships (teenage relationship abuse)
- Involves pupils being forced to use drugs or alcohol
- Involves Harmful Sexual Behaviour (HSB) both online and in-person
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting) in breach of Voyeurism Act 2019

If a pupil makes an allegation of child-on-child abuse against another pupil:

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed



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

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially – students are made aware of this in assemblies, form time, PSHEE lessons and at any other opportunity mapped through RSE curriculum model
- Ensuring staff are trained to understand that a child harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

7.8 Anti Bullying

The Trust's policy on anti-bullying is set out in a separate document and all staff acknowledge that, to allow or condone bullying may lead to concerns being escalated to the DSL and consideration will be given to a referral to Children's Social Care dependent on the concerns. This includes all forms of abuse such as: cyber, racist, homophobic and gender related bullying. Each school keeps a record of known bullying incidents. All staff are aware that some children perceived as being different are more susceptible to being bullied / victims of child abuse.

8. Working with parents/carers

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

- DSL will normally need to engage with all parties when there's been a report of sexual violence but will be decided on a case-by-case basis)
- DSL will consider carefully the information provided about the children involved.
- DSL will work with relevant agencies to ensure consistency of information sharing
- Good DSL practice is to meet parent or carers with the child/children to discuss what's being put in place to safeguard and support them and how the situation will progress.

Important note:

If the DSL believes that notifying the parents would increase the risk to the child, we will discuss this with the social care team before doing so using no name referral service.

9. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras; this includes visits and trips. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. Further information on the use of mobile devices can be found in the FPGS Mobile Device Strategy.

10. Safeguarding other children during reported incidents

DSL will offer support to children (and adult students) and families who have witnessed sexual violence, especially rape and assault by penetration. In addition, the DSL will try to ensure the victim,



alleged perpetrator(s) and any witnesses are not being bullied or harassed. "Try" is used as social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side. Consideration of transport to and from school needs to be discussed in terms of vulnerability.

11. Complaints and concerns about school safeguarding practices

11.1 Complaints against staff

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

11.2 Other complaints

Any serious complaints about Safeguarding matters should be referred directly to the Headteacher, as per the Complaints Policy available on our website.

11.3 Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff and volunteers should feel able to raise concerns about practice and potential failures in the school safeguarding regime. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO or the Education safeguarding co-ordinator. See also Medway Council Whistle blowing procedures, if you are unhappy with the response you have received please contact Office for Standards in Education or contact the Department for Education and Skills (0870 000 2288 or complaints.peu@dfes.gsi.gov.uk). Please see the full details in our Whistleblowing policy (available from the school office).

12. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. Records are both paper based and electronic (CPOMS), as needs decide. These are held securely in school and all electronic records are sent via encrypted email. Security is ensured as paper records are kept in locked filing cabinets in a locked office. **CPOMS:** All electronic records are password protected and only the Safeguarding Team and the Headteacher have access to these. These records will be kept for 7 years or until the student's 25th birthday (whichever is later) after our last contact with the student and/or family. Records are kept in strict confidence and only shared when appropriate in line with the Medway Safeguarding Partnership Procedure. In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

13. Training

13.1 All staff

All staff members will undertake annual safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training



will be regularly updated on a termly basis and is in line with advice from our Medway Children Services. All staff will have training on Prevent to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates through emails, e-bulletins and staff meetings) as required.

13.2 The DSL and The Safeguarding Team

The DSL and the Safeguarding Team will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and they will undertake Prevent awareness training.

13.3 The Local Governing Body

All members of The Local Governing Body receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. It is also expected that termly meetings with the DSL should be in place to ensure SCR is maintained and that incidents are being recorded effectively and dealt with by all in a sensitive and professional manner. All should be familiar with the KCSIE guidance document.

13.4 Recruitment – interview/appointment panels

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

14. Monitoring arrangements

This policy will be reviewed **annually** by Andrew Ost, Deputy Headteacher. At every review, it will be approved by the Local Governing Body.



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

Appendix 1: Types of abuse

Abuse, neglect and exploitation are safeguarding issues that are rarely standalone events – they tend to overlap. Understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online is essential and then exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content

1. **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
 - Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate
 - Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
 - Seeing or hearing the ill-treatment of another
 - Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
3. **Faith Abuse** - certain kinds of child abuse are linked to faith or belief. These include belief in witchcraft, spirit possession, demons or the devil and use of the fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation.
 4. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
 - Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing



- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
 - Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
5. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
 - Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
 - Protect a child from physical and emotional harm or danger
 - Ensure adequate supervision (including the use of inadequate care-givers)
 - Ensure access to appropriate medical care or treatment
 - It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
 6. **Gangs and youth violence** - Early warning signs of gang involvement or youth violence include aggression, truancy and substance use. For further information please see the [Kent and Medway Gang Strategy](#). Linked to this is the recent awareness of **county lines** and the way students are criminally exploited in order to carry drugs across county lines for the supply chain
 7. **Gender-based violence/Violence against women and girls** - Violence against women and girls (VAWG) is a term that covers a number of offences including domestic violence, stalking, sexual assault, forced marriage and FGM.
 8. **Private fostering** - Private fostering arrangements are arrangements made without the involvement of the LA for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative. Privately fostered children are a potentially vulnerable group. Schools should look out for:
 - A child being collected from school by someone new on a regular basis
 - A child mentioning that he/she is staying somewhere else or that his/her parents have gone away
 - Something unusual or unclear in the child's administration file
 9. **Domestic abuse** – we recognise that children who witnessed (where they see, hear or experience its effects) in terms of domestic abuse are also victims and will have a lasting impact in their relationships that they may have with others. This can be both emotionally and physically in their own intimate relationships as well. Abuse can be physical, sexual, financial, psychological or emotional.
 10. **Relationship abuse** - Teenage relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse.



These patterns might include sexual abuse, physical abuse, financial abuse, emotional abuse or psychological abuse – and ill treatment of others. Signs include:

- Physical signs injury/illness
- Truancy
- Falling grades
- Isolation from family and friends
- Frequent texts and calls from boyfriend/girlfriend
- Depression
- Self-harm

11. Online abuse (including sharing images of child abuse /upskirting) – a form of child-on-child abuse where images or videos of a sexual or indecent nature are shared on-line these are illegal if they are of children (anyone under the age of 18) or generated by children and contravene the Voyeurism Act of 2019

12. Trafficking - any child transported for exploitative reasons is considered to be a trafficking victim. Exploitation includes prostitution or other sexual exploitation, forced labour or services, slavery or servitude. Signs include a history with missing links and unexplained moves and/or Indications of physical or sexual abuse

13. Mental wellbeing issues – particularly post lockdown, these are at the top of the school agenda. Risk assessments are being carried out prior to any return and each student is RAG rated in terms of their wellbeing on return after contact has been made throughout the lockdown period. **These can involve:**

- Poor student – teacher engagement
- On-line bullying
- Breakdown in or lack of positive friendships
- Child influence and pressures
- Parental pressure to achieve
- Anxiety about levels of work missed
- SEN focus – for students with additional vulnerability including cognitive understanding between fact/fiction (especially online) and repetition of those behaviours witnessed.

Well-being groups are to be set up and run by staff and senior students to constructively provide a safe space to discuss or to seek calm and headspace from the stress and the “noise” of the world and the associated problems at home, in the family, in the locality, nationally and internationally – these are overseen by the Wellbeing lead.



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

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

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete
- Consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online
- Not include any repeated concerns or allegations that have all been found to be false, unfounded, unsubstantiated or malicious in a reference

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

Regulated activity means a person who will be:

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

Existing staff

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)



- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Local Governing Body

- All governors will have an enhanced DBS check without barred list information and section 128 check if required.

They will have an enhanced DBS check with barred list information if working in regulated activity.

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



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

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

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

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

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



Appendix 3: Allegations of abuse made against staff

In addition to being in this document it is also in a separate Procedure Document.

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- A 'case manager' will lead any investigation. This will be the headteacher, designated representative who reports to the headteacher or the chair of governors, where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
- Our procedures for dealing with allegations will be applied with common sense and judgement.
- If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Trust

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

Definitions for outcomes of allegation investigations

- Substantiated:** there is sufficient evidence to prove the allegation
- Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- False:** there is sufficient evidence to disprove the allegation
- Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made



Procedure for dealing with allegations

- In the event of an allegation that meets the criteria above, the case manager will take the following steps:
- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Support will be explained to the individual facing the allegation regarding trade union involvement, nominating a colleague to support and intercede for them and any support in terms of counselling or medical help that can be made available
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services)



and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.



Additional considerations for supply teachers and all contracted staff

- If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.
- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:
- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.



Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it



Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions



Learning lessons reviews

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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



Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weaknesses in the school's safeguarding system
- Reaffirming as part of the safeguarding training an openness regarding disclosures and developing a culture of it can and does happen here regarding safeguarding issues
- Whistleblowing is seen as important to safeguarding the children in our care and is supported at all levels of the organisation.



Responding to low-level concerns

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

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Low Level Concern Procedure

- Appoint an investigating officer and clerk
- Statements should be written by all parties involved
- Interviews should be undertaken of all parties involved
- A full report of findings will need to be published to the headteacher and this then communicated to all relevant parties – containing a timeline of events, a “findings” commentary on statements and interviews and a recommendations section
- Action to be taken in line with the recommendations

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance



Appendix 4: specific safeguarding issues

Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation, or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and **can happen online**.

For example, training is given to staff with regard to young people being persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant



They may also:

- Display inappropriate sexualised behaviour
- Suffer from changes in emotional wellbeing
- Misuse drugs and/or alcohol
- Regularly miss school or education, or not taking part in education having unexplainable and/or persistent absences from school.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- The student will:
 - Have difficulty walking, sitting or standing, or looking uncomfortable
 - Find it hard to sit still for long periods of time (where this was not a problem previously)
 - Spend longer than normal in the bathroom or toilet due to difficulties urinating
 - Have frequent urinary, menstrual or stomach problems
 - Avoid physical exercise or missing PE
 - Be repeatedly absent from school, or absent for a prolonged period
 - Demonstrate increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Be reluctant to undergo any medical examinations
 - Ask for help, but not being explicit about the problem
 - Talk about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl whose mother, older sibling or cousin who has undergone FGM
- A girl with limited level of integration within UK society
- A girl confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- A girl talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- A girl requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- A girl talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)



- A girl being unexpectedly absent from school
- A girl having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

PREVENTing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local Safeguarding Children Partnership. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, children who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful and often angry attitude towards others



- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions and being in contact with extremists, or seeking to join, extremist organisations
- Possessing extremist literature and accessing extremist material online

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a pupil, they will need to discuss their concerns with the DSL.

Staff should **always** take action if they are worried. All key staff are trained in PREVENT and information is cascaded.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in electronically and wear a visitor's badge. Without a DBS they will be given a red badge and should be accompanied by a member of staff at all times. We will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Missing pupils

Our procedures (using Missing email to SG team) means a child will be found and returned to effective supervision quickly. Parents will be contacted should the student not be found. Parents also have a duty to contact the school if they believe their child to be missing from school.

Non-collection of children

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

- Use emergency contact details for the parents and other relatives
- The student will be supervised until arrangements are made
- Arrange transport home if this is suitable
- Follow up the next school day to ensure there are no underlying safeguarding concerns
- If no parent or relative can be reached, an urgent referral would be made to Social Care

