



# **Safeguarding and Child Protection Policy**

## **Alwyn Infant School & Courthouse Junior School Federation**

**Approved by:** Governing Board

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## Important Contacts

### Alwyn Infant School

ROLE/ORGANISATION	NAME	CONTACT DETAILS
<b>Designated safeguarding lead (DSL)</b>	Wendy Harris	01628 622477 <a href="mailto:DSL@alwyn.org.uk">DSL@alwyn.org.uk</a>
<b>Deputy DSLs</b>	Kirsty Grierson, Amy Appleton, Lesley Harding	01628 622477 <a href="mailto:DSL@alwyn.org.uk">DSL@alwyn.org.uk</a>
<b>Chair of governors</b>	Chandra Kunder	01628 622477
<b>Link governor</b>	Jane Cox	01628 622477
<b>RBWM Single Point of Access (SPA)</b> Mon – Thurs 8.45am-5.15pm & Fri 8.45am-4.45pm		01628 683150
<b>Emergency Duty Service</b> (any time outside the hours above)		01344 786543
<b>Local authority designated officer (LADO)</b>	AfC LADO Service	0208 8917370 or 07774 332675 <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a>
<b>DfE Counter Extremism Helpline (Prevent)</b>		020 7340 7264

### Courthouse Junior School

ROLE/ORGANISATION	NAME	CONTACT DETAILS
<b>Designated safeguarding lead (DSL)</b>	Fiona Hayes	01628 685976 <a href="mailto:fhayes@courthousejunior.co.uk">fhayes@courthousejunior.co.uk</a>
<b>Deputy DSL</b>	Kelly Buxton, Beverley Roberts, Denise Harrold	01628 685976 office@courthousejunior.co.uk
<b>Chair of governors</b>	Chandra Kunder	01628 685976
<b>Link governor</b>	Jane Cox	01628 685976
<b>RBWM Single Point of Access (SPA)</b> Mon – Thurs 8.45am-5.15pm & Fri 8.45am-4.45pm		01628 683150
<b>Emergency Duty Service</b> (any time outside the hours above)		01344 786543
<b>Local authority designated officer (LADO)</b>	AfC LADO Service	0208 8917370 or 07774 332675 <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a>
<b>DfE Counter Extremism Helpline (Prevent)</b>		020 7340 7264

## 1. Aims

This policy sets out how the governing board of the Alwyn and Courthouse Federation is carrying out its statutory responsibility to safeguard and promote the welfare of children in accordance with Section 175 of the Education Act 2002.

At Alwyn and Courthouse, we recognise our responsibilities for safeguarding and promoting the health and well-being of all the children in our care.

All staff and governors are fully committed to ensuring that everyone at our schools takes safeguarding extremely seriously. We promote the welfare of children and work with other agencies to ensure adequate arrangements within our schools to identify, assess and support those children who are, or may be, suffering abuse.

We believe that children maximise their potential in an environment that is safe, secure and supportive of all their needs, including any needs they have for protection from abuse. We all have the right to be happy, to be safe and to learn and we all have the responsibility to make this happen.

Alwyn and Courthouse aim to ensure that:

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

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education 2023](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [Children Act 1989 Care Planning, Placement and Case Review](#)
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [Children Act 1989 Private Fostering](#) which gives comprehensive guidance on private fostering
- [Mental Health and Behaviour in Schools \(2018\)](#) and [Promoting children and young people's emotional health and wellbeing - A whole school approach \(2015\)](#), which helps inform mental health best practice
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [Inspecting Safeguarding in Early Years, Education and Skills](#)
- [Teachers Standards](#)

- [What to do if you are worried a child is being abused](#)
- [Equality Act 2010: advice for schools](#)
- [Information Sharing](#)
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

### 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

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

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Appendix 1 explains the different types of abuse.

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

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

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in a paid or a voluntary capacity.

**Parent** refers to the birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

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

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

### 4. Equality statement

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

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- 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, criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Have a social worker due to safeguarding or welfare needs
- Are looked after or previously looked after

- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. 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 Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2023](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to confirm that they have reviewed the guidance and take part in knowledge check activities to ensure their understanding of key messages. All staff will be aware of:

- Our systems, which support safeguarding, including this child protection and safeguarding policy, the staff, code of conduct. The role and identity of the designated safeguarding lead (DSL) and Deputy DSLs, 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 the 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), Child Criminal Exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, Mental Health, radicalisation and the additional vulnerabilities of children who are looked after/previously looked after, children with Special Educational Needs and Disabilities and children who are young carers

The Alwyn and Courthouse Federation will publish their Safeguarding and Child Protection policies on their websites and hard copies will be available on request from the school offices.

The roles of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead(s) will be explicit in their job descriptions and we will ensure that they have the time and resources to fulfil their duties.

### 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team who takes the lead responsibility for child protection and wider safeguarding. This responsibility will not be delegated.

The DSL for the Alwyn is Wendy Harris.

The DSL at Courthouse is Fiona Hayes.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The Deputy DSLs for Alwyn are Kirsty Grierson (Acting Executive Headteacher), Amy Appleton (ELSA) and Lesley Harding (ELSA).

The Deputy DSLs for Courthouse are Kelly Buxton (Assistant Headteacher), Beverley Roberts (ELSA), Denise Harrold (ELSA).

The DSLs can be contacted outside of school hours at [DSL@alwyn.org.uk](mailto:DSL@alwyn.org.uk) for Alwyn or [fhayes@courthousejunior.co.uk](mailto:fhayes@courthousejunior.co.uk) for Courthouse.

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

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff
- 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 Local Authority Children's Social Care, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Be alert to the specific needs of children in need, those with SEN and young carers
- Encourage a culture of listening to children and taking into account their wishes and feelings
- Provide advice and support to other staff on child welfare and child protection matters
- Undertake multi-agency (Level 3) safeguarding training with updates every two years and will refresh their knowledge and skills at regular intervals by attending the termly LA DSL network meetings
- Undertake Prevent awareness training
- Keep detailed, accurate records on CPOMs of all concerns about a child, even if there is no need to make an immediate referral
- Ensure that all such records are kept confidential, stored securely and are separate from the pupil's general file
- Ensure that an indication of the existence of the additional safeguarding and child protection file is marked on the pupil general file
- Ensure that a copy of the safeguarding and child protection file is retained until such time that the new school acknowledges receipt of the original file. Any paper copies will be shredded
- Has a working knowledge of RBWM Multi Agency Safeguarding Board (<https://rbwmsafeguardingpartnership.org.uk/>) and AfC procedures
- Ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments and provide a report, where required, which has been shared with the parents and child (depending on age and understanding)
- Notify Local Authority Children's Social Care if a child subject to a child protection plan is absent from school without explanation
- Ensure that all staff sign to say they have read, understood and agree to work within our schools' safeguarding and child protection policy, Keeping Children Safe in Education 2023 Part 1 and Annex B and ensure that the policies are used appropriately
- Organise child protection and safeguarding induction, regularly update training (including online safety) for all school staff, keep a record of training and address any absences
- Undertake, with the Executive Headteacher and Governing Board, an annual audit of Alwyn and Courthouse Federation's safeguarding policies, procedures and practices and ensure that this is submitted to RBWM Multi Agency Safeguarding Board (<https://rbwmsafeguardingpartnership.org.uk/>)
- Has an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation
- Help to promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff
- Ensure that the name of the designated safeguarding lead and deputies are clearly advertised in the school and on the website, with a statement explaining the school's role in referring and monitoring cases of suspected abuse
- Ensure that they, or a deputy, are available during term time school hours for staff to discuss any safeguarding concerns
- Ensure that there are adequate and appropriate cover arrangements for any out of hours or out of term activities.

This list is not exhaustive: please see Keeping Children Safe in Education 2023



The DSL will also keep the Executive Headteacher and Heads of School informed of any issues, liaise with local authority case managers, and designated officers for child protection concerns as appropriate.

### **5.3 Deputy Designated Safeguarding leads**

Are trained to the same standard as the DSL and in the absence of the DSL carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the long-term absence of the DSL, the deputy will assume all of the functions of the DSL.

The full responsibilities of the DSL and deputies are set out in their job description.

### **5.4 Designated teacher for looked after children**

Our designated teacher for looked after children for Alwyn Infant School is Wendy Harris and for Courthouse Junior School is Fiona Hayes.

### **5.5 Single point of contact**

Our single point of contact teacher for Alwyn is Wendy Harris and Courthouse is Fiona Hayes.

### **5.6 Link governor**

The lead governor for the Alwyn and Courthouse Federation is Jane Cox.

### **5.7 The governing board**

It is recommended that all governors will read Keeping Children Safe in Education, September 2023 in its entirety, including Annex C, the Safeguarding and Child Protection Policy and attend safeguarding training.

The Governing Board of the Alwyn and Courthouse Federation understands and fulfils its responsibilities, namely to ensure that:

- they liaise with the Executive Headteacher and/or the DSL over safeguarding matters. This is a strategic role rather than operational. Governors will not be involved in concerns regarding individual children
- there is a Safeguarding and Child Protection policy that reflects the whole school approach to child-on-child abuse
- child protection, safeguarding, recruitment and managing allegations policies and procedures, including the Staff Behaviour Policy (Code of Conduct), are consistent with RBWM Multi Agency Safeguarding Board (<https://rbwmsafeguardingpartnership.org.uk/>) and statutory requirements. They are reviewed when needed and annually as a minimum. The Safeguarding and Child Protection policy is publicly available on the school website
- all staff, including temporary staff and volunteers sign to say they have read, understood and agree to work within Alwyn and Courthouse Federation Safeguarding and Child Protection policy
- all staff sign to say they have read and understood Keeping Children Safe in Education (2023) part 1 and Annex B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance
- the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and ensure that there is at least one person on every recruitment panel who has completed safer recruitment training within the last five years
- Alwyn and Courthouse Federation have procedures for dealing with allegations of abuse against staff (including the Executive Headteacher), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned
- the Governing Board has at least one nominated governor responsible for safeguarding who has undertaken appropriate training for the role. The chair of governors is responsible in the event of an allegation of abuse made against the Executive Headteacher
- an annual audit of the schools' safeguarding policies, procedures and practices is undertaken with the Executive Headteacher and designated safeguarding lead (DSL) and that this is reported to the Board and submitted to RBWM Multi Agency Safeguarding Board (<https://rbwmsafeguardingpartnership.org.uk/>)
- Alwyn and Courthouse Federation is aware of relevant legislation and local guidance, which has been agreed through the local safeguarding partnership arrangements
- there are clear lines of accountability for safeguarding within the schools' leadership

- a member of the senior leadership team has been appointed as the designated safeguarding lead and they will take lead responsibility for safeguarding and child protection; the role is explicit in the role holder's job description
- DSLs and their deputies undertake multi-agency (Level 3) safeguarding training which is updated every two years
- there is a designated teacher to promote the educational achievement of children looked after who are on the school roll
- at least one member of the Governing Board has completed safer recruitment training to be repeated every five years
- children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and through relationships education or relationships and sex education (RSE)
- appropriate safeguarding responses are in place for children who go missing from education, particularly on repeated occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future
- appropriate online filtering and monitoring systems are in place. We will:
  - identify and assign roles and responsibilities to manage filtering and monitoring systems.
  - review filtering and monitoring provision at least annually.
  - block harmful and inappropriate content without unreasonably impacting teaching and learning.
  - have effective monitoring strategies in place that meet their safeguarding needs.
- enhanced Disclosure and Barring Service (DBS) checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all governors

## **5.8 The Executive Headteacher and Heads of School**

The Executive Headteacher and Heads of School are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring that systems are in place for children to express their views and give feedback, which operate with the best interests of the child at heart
- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing/managing allegations against staff procedures
- Ensuring the relevant staffing ratios are met, where applicable

## **6. Safe school, safe staff**

We will ensure that:

- at least one member of every recruitment panel has completed safer recruitment training within the last five years

- safer recruitment practices are adhered to including appropriate DBS checks, reference checks and any additional checks relevant to the role undertaken. The Alwyn and Courthouse Federation has a Safer Recruitment Policy which is available as a separate document
- all staff are aware of the need for maintaining appropriate and professional boundaries in their relationship with staff, pupils and parents and adhere to The Alwyn and Courthouse Federation's code of conduct
- as a result of learning from a local Serious Case Review, there will be no alcohol for events onsite involving staff, pupils, parents or Governors unless approved by the executive headteacher
- as a result of learning from a local Serious Case Review, there will be no use of alcohol by staff or pupils on school trips or at residential units
- our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time
- adequate risk assessments/assurances are in place including for off-site activities, after school clubs and residential trips
- any disciplinary proceedings against staff related to child protection matters are concluded in full in accordance with Government guidance Keeping Children Safe in Education 2023, RBWM Multi Agency Safeguarding Board LADO and HR policy, procedures and guidance
- staff have the confidence, and are fully aware of how to report misconduct, including low level concerns
- all staff receive information about The Alwyn and Courthouse Federation's safeguarding arrangements, safeguarding statement, Staff Behaviour Policy (Code of Conduct), Safeguarding and Child Protection policy, the role and names of the DSL and their deputies, and Keeping Children Safe in Education part 1 and Annex A on induction, as well as other relevant procedures such as health and safety and online safety
- all staff receive safeguarding and child protection training at induction, which is regularly updated. In addition, they receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required, but at least annually
- all members of staff are trained in and receive regular updates in online safety and reporting concerns
- all staff and governors have regular safeguarding awareness training, updated by the DSL or LA as appropriate, to maintain their understanding of the signs and indicators of abuse
- the safeguarding and child protection policy is made available via our school website or other means and parents and carers are made aware of this policy and their entitlement to have a copy via the school handbook, newsletter or website
- all parents and carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the safeguarding and child protection policy and reference to it in our school's handbook
- The Alwyn and Courthouse Federation provide a co-ordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans, such as school attendance at the Early Help Resilience Network meetings
- community users organising activities for children are aware of The Alwyn and Courthouse Federation's safeguarding and child protection policy, guidelines and procedures
- the names of the DSL and deputies are clearly advertised in the school
- all staff will be given a copy of Part 1 and Annex B of Keeping Children Safe in Education 2023 and will sign to say they have read and understood it. The DSL and the Governing Board are required to read the whole document.

### 6.1 Extended school and off-site arrangements

- Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply.
- If other organisations provide services or activities on our site, we will ensure that they have appropriate procedures and training in place, including safer recruitment procedures.
- When our pupils attend off-site activities, we will ensure that effective child protection arrangements are in place.
- When our pupils attend an alternative provision provider, we will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff. We follow the [statutory guidance for alternative provision](#).
- Where a parent/carer has expressed their intention to remove a child from our school with a view to educating at home, we will work together with the parent/carer, EHE Coordinator and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant where a child has SEND, is vulnerable, and/or has a social worker.

### 6.2 Media recordings, audio, image and video (including digital files)

The vast majority of people who take or view images or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect pupils, we will:

- seek their consent and parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- use only the pupil's first name with an image
- ensure that pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- ensure that pupils do not take photographs or video images of other students without their express permission and the permission of a member of staff

Staff are permitted to make media recordings to support educational aims but must follow our policies in respect of sharing, distribution and publication. Media images must be taken, edited, stored or archived on to school systems using school equipment.

### 6.3 Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL or deputy DSL'.

### 6.4 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to Local Authority Children's Social Care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

To make an immediate, direct referral please call **Children's Services – Single Point of Access (SPA)** 8.45am to 5.15pm Monday to Thursday, 8.45am to 4.45pm Friday on 01628 683150 or the **Out of Hours Team** on 01344 786543.

You can also use the following link to the GOV.UK webpage for reporting child abuse to your local council:  
<https://www.gov.uk/report-child-abuse-to-local-council>

### **6.5 If a child makes a disclosure to you**

All staff should be aware that children might not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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

- Listen to and believe them
- Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you
- Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on
- Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words using the school form. Stick to the facts, and do not put your own judgement on it
- Do not start an investigation
- Share information on a needs to know basis, do not discuss with colleagues, family or friends
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Local Authority Children's Social Care and/or the police directly, and tell the DSL as soon as possible that you have done so

### **6.6 Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

The DSL will make an immediate referral to police and/or Local Authority Children's Social Care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13

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

If none of the above apply then the DSL, in consultation with the Executive Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or Local Authority Children's Social Care.

### **6.7 Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or Local Authority Children's Social Care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to Local Authority Children's Social Care and/or the police immediately.

### **6.8 Informing parents**

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

### **6.9 Referring to the police**

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

### **6.10 Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded on CPOMS. The record-keeping arrangements set out in section 20 of this policy also apply to recording incidents of sexting.

### **6.11 Notifying parents or 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.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with MASH before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

### **6.12 Early help**

If early help is appropriate, the DSL will 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, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority Local Authority Children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

### **6.13 Referral**

If it is appropriate to refer the case to local authority Local Authority Children's Social Care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1) you must tell the DSL as soon as possible.

The MASH team will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with MASH 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 follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## 7. Confidentiality

The Alwyn and Courthouse Federation takes confidentiality and data protection seriously. For details on this, please refer to the Federation's GDPR policies and privacy notice.

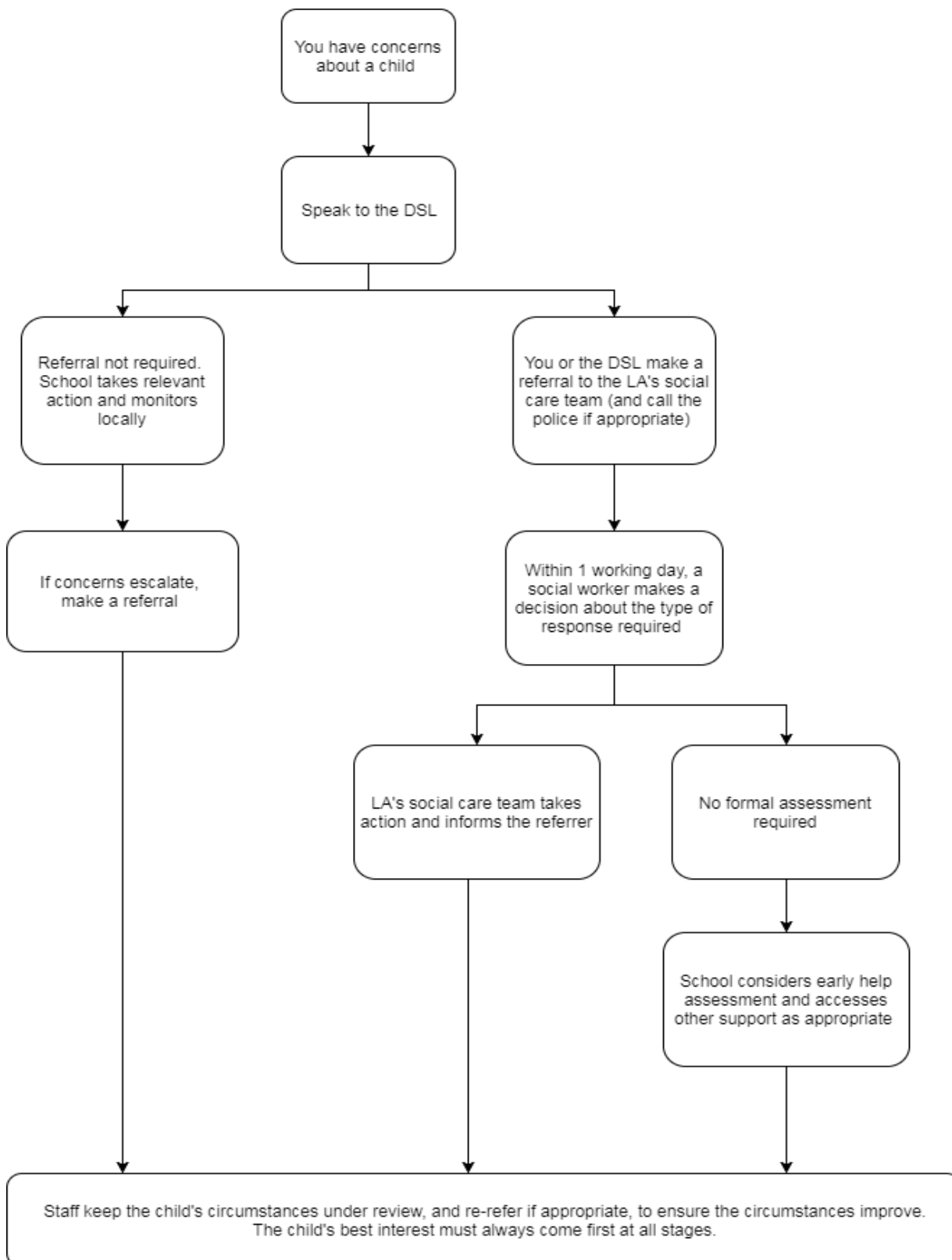
Information must be shared on a 'need-to-know' basis, but we do not need consent to share information if a child is suffering, or at risk of, serious harm.

You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's **information sharing advice for safeguarding practitioners** includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead or deputy
- Confidentiality is also addressed in this policy with respect to record keeping in section 20 and allegations of abuse against staff in appendix 3.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm or in immediate danger)**

(Note –if the DSL is unavailable, this should not delay action. See section 7.1 for what to do.)





## **8. Curriculum coverage**

Pupils are taught about keeping themselves safe and how to ask for help. Pupils are taught about the issues surrounding sexting as part of our PSHE education, age appropriate, and computing programmes. Teaching is age appropriate and covers the following in relation to sexting:

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

Pupils also learn the strategies and skills needed to manage:

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

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **9. Child protection overview and specific safeguarding concerns**

### **9.1 Recognising abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

### **9.2 There are four categories of abuse**

#### **Physical abuse**

Physical abuse 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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

#### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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, such as in situations of domestic abuse. It may involve serious bullying (including online bullying), 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.

## Sexual abuse

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.

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

Our school is aware of the impact of the Everyone's Invited website and the prevalence of harmful sexual behaviour. We encourage all pupils either to speak out in person or to report concerns using our anonymous reporting system.

## Neglect

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

Definitions taken from Working Together to Safeguard Children (HM Government, 2018)  
[Working Together to Safeguard Children 2018](#)

Neglect can occur in affluent families. [Engaging Neglectful Parents from Affluent Backgrounds Threshold Document](#)

### 9.3 Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits/be hungry/take food from others

- have difficulty in making or sustaining friendships
- appear fearful/anxious
- be reckless with regard to their own or others' safety
- self-harm
- low self-esteem
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become uninterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

#### **9.4 Impact of abuse**

The sustained abuse or neglect of children physically, emotionally or sexually can have long-term effects on the child's health, development and wellbeing. It can significantly affect a child's self-esteem, self-image and on their perception of self and of others. The more Adverse Childhood Experiences (ACEs) a child has, the more likely they are to suffer long term. The effects can extend into adult life and lead to difficulties in forming and sustaining positive and close relationships. In some situations, it can affect parenting ability.

#### **9.5 Taking action**

**Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of 'It could happen here'.**

Key points for staff to remember when taking action are:

- in an emergency, take the action necessary to help the child, for example call 999
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern, pass to the DSL and seek support for yourself if you are distressed or need to debrief

#### **9.6 Mental health**

Mental health issues affect at least 1 in 10 children and young people. They include depression, anxiety, low self-esteem, disordered eating, panic attacks, sleep problems and many other conditions and behaviours. They are often a direct response to what is happening in their lives.

The Alwyn and Courthouse Federation recognises that mental health issues can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and is aware that only appropriately-trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health issue, or be at risk of developing one.

Possible warning signs include:

- Persistent sadness — two or more weeks
- Withdrawing from or avoiding social interactions
- Hurting oneself or talking about hurting oneself
- Talking about death or suicide
- Outbursts or extreme irritability
- Out-of-control behaviour that can be harmful
- Drastic changes in mood, behaviour or personality
- Changes in eating habits
- Loss of weight
- Difficulty sleeping
- Frequent headaches or stomach aches
- Difficulty concentrating
- Changes in academic performance
- Avoiding or missing school

The Alwyn and Courthouse Federation aims to promote positive mental health for all staff and pupils. Our mental health lead in is Fiona Hayes.

The Alwyn and Courthouse Federation will ensure that staff, pupils and parents are made aware of the support available in school and in the local community.

### **9.7 Domestic abuse**

The [Domestic Abuse Act 2021](#) recognises the impact of domestic abuse on children, as victims in their own right if they see, hear or experience the effects of abuse.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- economic
- emotional
- controlling or coercive behaviour

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs.

The Alwyn and Courthouse Federation recognises that exposure to domestic abuse 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. The Alwyn and Courthouse Federation acknowledges that domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

The Alwyn and Courthouse Federation has signed up to the police initiative Operation Encompass that helps the school to provide silent support to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic

incident, the police will inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child's circumstances and can enable silent support to be given to the child according to their needs.

### **9.8 Homelessness**

The Alwyn and Courthouse Federation recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into 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, including new poverty induced by the pandemic
- rent arrears
- domestic abuse and antisocial behaviour
- the family being asked to leave a property

If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

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

The Alwyn and Courthouse Federation recognises that children who have a family member in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The school will work with agencies and resources to help mitigate negative consequences for those children.

### **9.10 Contextual safeguarding and exploitation**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The focus of contextual safeguarding and exploitation (CS&E) is implementing child-safeguarding practices into community spaces to ensure that children are protected from the harm they experience outside of the family home. This focus moves beyond just assessing parenting capacity to safeguard a child at home, to assessing the impact of peer groups and community spaces (schools and neighbourhoods) on a child's safety and wellbeing outside the home.

It looks to identify the influences outside the family that can impact the parent-child relationship and the safety of a child in the community. It then adapts the child protection systems, safeguarding partnerships, and creates new professional networks with those who have an influence in the location so that the identified child, their family and the community are safe.

The Alwyn and Courthouse Federation will maintain records of concerns about extra familial harm in the same way as other concerns are recorded and in accordance with our safeguarding procedures.

Concerns relating to significant harm and extra familial harm will be referred by the DSL to the Single Point of Access Team; if considered appropriate, a multi-agency strategy meeting will be held to determine threshold for significant harm.

### **9.11 Children missing education**

We recognise that full attendance at school is important to the wellbeing of all our pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely and we work in partnership with AfC when patterns of absence give rise to concern.

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation and can be a sign of child criminal exploitation, including involvement in county lines. 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 and other harmful practices.

We will ensure, where possible, that we have more than one emergency contact number for each pupil. This will give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Our attendance policy is set out in a separate document and is reviewed regularly by the Governing Board. The school operates in accordance with statutory guidance [Children missing education: statutory guidance for local authorities](#)

### **9.12 Children who run away or go missing from home or care**

The Alwyn and Courthouse Federation recognises that children who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

When necessary and in conjunction with AfC or other relevant local authority, The Alwyn and Courthouse Federation will facilitate return home interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place.

### **9.13 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.”

Child sexual exploitation is a form of child sexual abuse affecting boys and girls. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation may occur without the child being aware of events, or understanding that these constitute abuse.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18, including 16 and 17 year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- 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's or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- 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. While 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, or access to economic or other resources

### **Consent**

Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation), consent cannot legally be given whatever the age of the child.

### **Key factors in child sexual exploitation**

Child sexual exploitation involves some form of exchange (sexual activity in return for something) between the victim and/or perpetrator or facilitator. Where there is no such exchange, for example, where the gain for the perpetrator is sexual gratification (or the exercise of power or control), this is described as sexual abuse (and not exploitation).

The exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). The receipt of something by a child/young person does not make them any less of a victim.

It is also important to note that the prevention of something negative can also fulfil the definition of exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

### **Links to other kinds of crime**

- Child trafficking
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution
- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

## **Potential vulnerabilities**

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

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

## **Possible indicators of child sexual exploitation**

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

All young people are at risk from online exploitation and can be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the transfer of images can be quickly and easily shared with others, which makes it difficult to contain the potential for further abuse.



## **Children may be perpetrators of abuse**

It must be recognised that children may also be perpetrators of abuse, sometimes at the same time as being abused themselves.

### **9.14 Child criminal exploitation (CCE)**

Child criminal exploitation can happen to girls as well as boys. It is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact, it can also occur with technology. CCE can include children being:

- forced to work in cannabis factories
- coerced into moving drugs or money across the country (county lines)
- forced to shoplift or pickpocket
- forced to threaten other young people
- manipulated into committing vehicle crime

Some of the following can be indicators of CCE:

- unexplained gifts or new possessions
- association with other young people involved in exploitation
- changes in emotional wellbeing
- misuse of drugs and alcohol
- regular missing episodes or frequently coming home late
- missing school or education

### **9.15 County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes.

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. While 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.

### **9.16 Serious youth violence**

Staff at The Alwyn and Courthouse Federation are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff are aware of the range of risk factors that increase the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

### **9.17 School-related weapons incidents**

The Alwyn and Courthouse Federation has a duty and a responsibility to protect and safeguard our pupils and staff. The Alwyn and Courthouse Federation will inform SPA and the police of any incident involving a weapon or potential weapon.

Teachers have a number of legal powers, which include the power to search pupils without consent for a number of 'prohibited items'. These include knives and weapons; alcohol; illegal drugs and stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, cause personal injury or damage to property; and any item banned by the school rules that has been identified in these rules as an item that may be searched for [searching, screening and confiscation](#)

The Alwyn and Courthouse Federation recognises that children and young people involved in school-related weapons incidents, including the alleged perpetrators, are vulnerable. The Alwyn and Courthouse Federation will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

### **9.18 Child on Child abuse**

The Alwyn and Courthouse Federation has a Behaviour/Relationships Policy that sets out our whole school approach to child on child abuse.

Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school and online. All staff are able to recognise the indicators and signs of abuse and know how to identify it and respond to reports. This can include (but is not limited to):

- bullying (including online bullying, prejudice-based and discriminatory bullying)

- abuse within intimate partner relationships
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

In areas where gangs are prevalent, older pupils may attempt to recruit younger pupils using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

The Alwyn and Courthouse Federation does not tolerate any form of abuse and will not allow any such behaviour to be passed off as 'banter', 'just having a laugh' or 'part of growing up'. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

**What to do:**

- When a pupil against another pupil makes an allegation, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the designated safeguarding lead 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 children's services to discuss the case. It is possible that children's services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a children's services referral where appropriate.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both pupils' files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim).
- 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.
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

**9.19 Bullying**

The Alwyn and Courthouse Federation has an anti-bullying policy which is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms, e.g. online, racist, homophobic, gender, SEND-related bullying. We keep a record of known bullying incidents, which is shared with and analysed by the Governing Board. All staff are aware that children with SEND and/or differences or perceived differences are more susceptible to being bullied or being victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the headteacher and DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education. We have a duty to record and regularly report to the local governing body incidents of recorded racism within the school.

### **9.20 Sexual violence and sexual harassment**

The Alwyn and Courthouse Federation follows the DfE's advice about sexual violence and sexual harassment between children in schools.

Sexual violence and sexual harassment can occur between two pupils of any sex. They can also occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils.

It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.

Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. The Alwyn and Courthouse Federation will ensure that **all** victims are taken seriously and offered appropriate support.

Sexual violence and sexual harassment is not acceptable at The Alwyn and Courthouse Federation. Behaviours such as making sexual remarks (even if they are meant as compliments), grabbing bottoms, breasts and genitalia is not 'banter' or 'having a laugh' and will never be tolerated.

The Alwyn and Courthouse Federation recognises that the following pupils can be especially vulnerable to sexual violence and sexual harassment:

- Children with Special Educational Needs and Disabilities (SEND)
- Pupils who are Lesbian, Gay, Bi, or Trans, Questioning (LGBTQ) or who are perceived to be LGBTQ by their peers.

#### **Sexual violence:**

Sexual violence refers to sexual offences under the [Sexual Offences Act 2003](#):

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

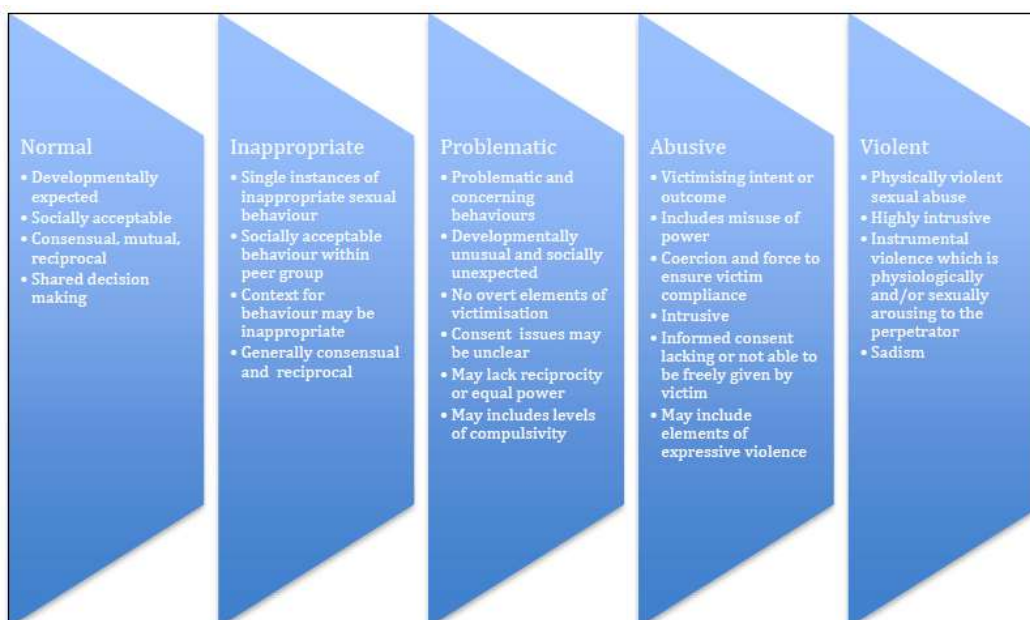
**Consent:** Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

**Sexual harassment:** Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- sexual 'jokes' or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos unwanted sexual comments on social media; sexualised online bullying; exploitation; coercion and threats. Online sexual harassment may be stand-alone or part of a wider pattern of sexual harassment and/or sexual violence.

**Harmful sexual behaviours:**



Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Harmful sexual behaviours refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. For more information, see [NSPCC Harmful Sexual Behaviours](#)

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Harmful sexual behaviours will be considered in a child protection context.

The Alwyn and Courthouse Federation recognises that pupils displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

The Alwyn and Courthouse Federation has a clear set of values and standards and these will be upheld and demonstrated throughout all aspects of school life.

The PSHE and RSE curriculum covers the following issues according to the age and stage of development of the pupils:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment is always wrong
- addressing cultures of sexual harassment
- consent

### **Responding to allegations of sexual harassment and sexual violence**

Pupils in our school know how to report concerns. All reports are treated seriously, including those that occur online or out of school.

The Alwyn and Courthouse Federation will make decisions on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

The management of children and young people with sexually harmful behaviour is complex and The Alwyn and Courthouse Federation work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect both the victim and the alleged perpetrator. A written record will be made and next steps discussed, taking into account the views of the victim.

A risk and needs assessment will be completed for all reports of sexual violence. The need for a risk and needs assessment for reports of sexual harassment will be considered on a case by case basis. The assessment, which will be kept under review, will consider:

- whether there may have been other victims
- the victim, especially their protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at The Alwyn and Courthouse Federation, especially any actions that are appropriate to protect them from the alleged perpetrator or from future harm.

The Alwyn and Courthouse Federation will ensure that appropriate measures are put in place to safeguard and support the victim, the alleged perpetrator and the school community.

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

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the pupil and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual according to our Behaviour Policy.

### 9.21 Upskirting

The Alwyn and Courthouse Federation will ensure that all staff and pupils are aware of the changes to the [Voyeurism \(Offences\) Act 2019](#) which criminalise the act of 'upskirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders."

Incidents of upskirting in the school will not be tolerated. The Alwyn and Courthouse Federation will make decisions on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

### 9.22 Sharing nudes and semi-nudes

The Alwyn and Courthouse Federation will act in accordance with guidance endorsed by DfE [Sharing nudes and semi-nudes: how to respond to an incident](#)

All incidents of sharing nudes and semi-nudes will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people who share nudes and semi-nudes of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. The Alwyn and Courthouse Federation will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of sharing nudes and semi-nudes should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to sharing nudes and semi-nudes is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about a sharing nudes and semi-nudes issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (it should be confiscated). This is consistent with DfE advice "Searching, screening and confiscation: advice for headteachers, school staff and governing bodies" (DfE January 2018), page 11 'After the search'. [Searching, screening and confiscation](#)

**Staff will not look at, share or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).**

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents and carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to SPA and/or the police immediately.

The police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported sharing nudes and semi-nudes incident is experimental or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation, sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sharing nudes and semi-nudes will be referred to AfC's Single Point of Access for advice about whether or not a response by the police and/or children's social care is required.

This will facilitate consideration of whether:

- there are any offences that warrant a police investigation
- child protection procedures need to be invoked
- parents and carers require support in order to safeguard their children
- any of the perpetrators and/or victims require additional support, this may require the initiation of an early help assessment and the offer of early help services.

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves
- pressure applied to a number of students (e.g. all female students in a class or year group) to create and share indecent images of themselves
- pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)
- what is known about the imagery suggests the content depicts sexual acts that are unusual for the young person's developmental stage or are violent
- sharing of indecent images places a young person at immediate risk of harm, for example the young person is presenting as suicidal or self-harming.

The DSL will make a judgement about whether or not a situation in which nudes and semi-nudes have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident or whether the school is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will consult with the police and the SPA to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

### **Viewing the imagery**

Adults should not view nudes and semi-nudes unless there is a good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.



Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil.

If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery then the DSL will:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the headteacher
- ensure viewing is undertaken by the DSL or deputy DSL with delegated authority from the headteacher
- ensure viewing takes place with another member of staff present in the room, ideally the headteacher, another DSL or a member of the Senior Leadership Team. The other staff member does not need to view the images
- wherever possible ensure viewing takes place on school premises, ideally in the headteacher's or DSL's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

### **Deletion of images**

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

### **9.23 Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a pupil in this area, the DSL (or a deputy) will consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people

are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

### **9.24 Online safety**

The Alwyn and Courthouse Federation has a whole school approach to online safety, which protects and educates pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Online safety is reflected as required in all relevant policies and is considered when planning the curriculum in all subjects.

Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, TikTok, Twitter, MSN, Tumblr, Snapchat, Instagram and gaming platforms.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in school. Many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

The Alwyn and Courthouse Federation's online safety policy explains how we try to keep pupils safe in school and protect and educate pupils in the safe use of technology. The Alwyn and Courthouse Federation follows the DfE guidance regarding teaching online safety in schools (2019) [Teaching online safety in schools](#)

Online bullying and sharing nudes and semi-nudes by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sharing nudes and semi-nudes' below).

### **9.25 So-called 'honour based' abuse**

So-called 'honour based' abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Crimes include female genital mutilation (FGM), forced marriage and harmful practices such as breast ironing.

Honour based abuse might be committed against young people in our school who

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to avoid an arranged marriage
- want to avoid a forced marriage

- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour in or justification for abusing the human rights of others. Staff at The Alwyn and Courthouse Federation will record and report any concerns about a child who might be at risk of HBA to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral to the police and/or the SPA as with any other child protection concern and may also contact the forced marriage unit for advice as necessary.

### **9.26 Female genital mutilation (FGM)**

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators.

These risk indicators may include:

- pupil talking about getting ready for a special ceremony
- family taking a long trip abroad
- pupil's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Gambia, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani)
- knowledge that the pupil's sibling has undergone FGM
- pupil talking about going abroad to be 'cut' or to prepare for marriage

Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday period. Staff are aware that it is also possible for these procedures to be undertaken in the UK.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern.

Signs that may indicate a pupil has undergone FGM:

- prolonged absence from school and other activities
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still and looking uncomfortable
- complaining about pain between the legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity

- repeated urinary tract infection
- disclosure

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting.

The mandatory reporting duty applies to all persons in The Alwyn and Courthouse Federation who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report to the police.

In The Alwyn and Courthouse Federation teachers in this situation will record their concerns on the concern form and inform the DSL, who will support the teacher in making a direct report to the police.

There are no circumstances in which a teacher or other member of staff will examine a girl.

### **9.27 Forced marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

### **9.28 Child trafficking and modern slavery**

Human trafficking, is defined in the UN Protocol on trafficking, adopted in 2000, as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern slavery as it is often referred to, is a crime and a safeguarding issue affecting millions across the world and in the United Kingdom.

Staff at The Alwyn and Courthouse Federation are alert to the existence of modern slavery and child trafficking and concerns will be recorded and reported to SPA as appropriate.

#### **Types of Modern Slavery**

Examples of industries and services where slavery exist in the UK today, the victims of which include children and young people are (with examples)

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

- In addition, victims can be forced into criminal activities such as cannabis production, theft or begging.

Modern slavery is an issue that transcends age, gender and ethnicities. It can include victims that have been brought to the UK from overseas or vulnerable people in the UK being forced illegally to work against their will. Children and young people have an increased vulnerability to slavery.

Poverty, limited opportunities at home, lack of education, unstable social and political conditions and war are some of the situations that contribute to trafficking of victims and slavery.

Slavery can be linked to a number of safeguarding issues, including child sexual exploitation, but normally includes at least one of the following specific situations.

- Child trafficking: young people being moved internationally or domestically so that they can be exploited.
- Forced labour: victims are forced to work through physical or mental threat, against their will, often for very long hours for little or no pay, in conditions that can affect their physical and mental health. They are often subjected to verbal or physical threats of violence against them as individuals or their families.
- Debt bondage: victims forced to work to pay off debts that they will never be able to. Debts can be passed down to children. Extreme examples include where a victim may be owned or controlled by an 'employer' or sold as a commodity.

Possible signs and indicators that someone is a victim of modern slavery that anyone working with children and young people should be aware of include:

- physical appearance: poor physical condition, malnourishment, untreated injuries and looking neglected
- isolation: victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. They may not interact and be unfamiliar in their local community
- poor living conditions: victims may be living in dirty, cramped or overcrowded accommodation, with multiple children living and working at the same address or premises
- personal belongings: few possessions, wearing the same clothes each day and no identification documents
- restricted freedom: victims have little opportunity to move freely and may be kept from having access to their passport
- unusual travel times: victims may be dropped off or collected from work on a regular basis either very early or late at night
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to approach people and have lack of trust or concern about making a report should they be deportation or fear of violence on their family

If a member of The Alwyn and Courthouse Federation staff suspects that a pupil may be a victim they will, in the first instance, report their concerns to the DSL.

The DSL will seek advice and support from SPA who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM).

Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

[Modern slavery: how to identify and support victims](#)

### **9.29 Private fostering**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined

as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

The Alwyn and Courthouse Federation recognises that most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases. Therefore all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When The Alwyn and Courthouse Federation becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, we will encourage parents and private foster carers to notify Children's Social Care themselves in the first instance, but also alert them to our mandatory duty as a school to inform the local authority of children in such arrangements.

### **9.30 Radicalisation and extremism**

Protecting children from the risk of radicalisation is part of The Alwyn and Courthouse Federation's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse.

Section 26 of the [Counter-Terrorism and Security Act 2015](#) places a duty on education and other children's services ('specified authorities') to have 'due regard to the need to prevent people from being drawn into terrorism'.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The government defines extremism as vocal or active opposition to fundamental British values.

The Alwyn and Courthouse Federation seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to far right/neo-Nazi/white supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist animal rights movements.

Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During this stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas.

The Alwyn and Courthouse Federation takes seriously our responsibility to ensure that children are safe from terrorist and extremist material when accessing the internet in school.

During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. The Alwyn and Courthouse Federation is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. The Alwyn and Courthouse Federation promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

The Alwyn and Courthouse Federation staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area and a specific understanding of how to identify and support individual children who may be at risk of radicalisation. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

The Alwyn and Courthouse Federation recognises the importance of providing a safe space for children to discuss controversial issues and build the resilience and critical thinking skills needed to challenge extremist perspectives.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they will speak with the DSL.

The Alwyn and Courthouse Federation will discuss any concerns about possible radicalisation identified in school with a pupil's parents and carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk. They will also support parents and carers who raise concerns about their children being vulnerable to radicalisation.

We will then follow normal safeguarding procedures, which may involve contacting the Single Point of Access for consultation and further advice and/or making appropriate referrals to the police PREVENT team and Channel programme for any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

We expect all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that hire school premises to behave in accordance with the school's code of conduct. We will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

### **9.31 Suicide and self-harm**

**Suicide:** an act of deliberate self-harm which results in death.

**Self-harm:** self-poisoning or self-injury, irrespective of the apparent purpose of the act.

**Suicide and self-harm links:** self-harm is generally a way of coping with overwhelming emotional distress. Many young people self-harm where there is no suicidal intent. However, research shows that young people who self-harm can be at a higher risk of suicide.

Self-harm is a coping mechanism that enables a person to express difficult emotions. Young people who hurt themselves often feel that physical pain is easier to deal with than the emotional pain they are experiencing, because it is tangible. But the behaviour only provides temporary relief and fails to deal with the underlying issues that a young person is facing. For some people, self-harm may last for a short time. For others, it can become a long-term problem. Some people self-harm, stop for a while, and return to it months, even years, later, in times of distress.

Risk factors that indicate a child or young person may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as bereavement; bullying; online bullying; mental health problems including eating disorders; family problems such as domestic violence; or any form of abuse or conflict between the child and parents.

The most common forms of self-harm are

- cutting
- biting self
- burning, scalding, branding
- picking at skin, reopening old wounds
- breaking bones, punching
- hair pulling
- head banging
- ingesting objects or toxic substances
- overdosing with a medicine

Self-harm is usually a secretive behaviour but signs may include:

- wearing long sleeves at inappropriate times
- spending more time in the bathroom
- unexplained cuts or bruises, burns or other injuries
- unexplained smell of Dettol, TCP, etc.
- low mood - seems to be depressed or unhappy, low self-esteem, feelings of worthlessness
- any mood changes - anger, sadness
- changes in eating or sleeping patterns
- losing friendships, spending more time by themselves and becoming more private or defensive
- withdrawal from activities that used to be enjoyed
- abuse of alcohol and/or drugs

The Alwyn and Courthouse Federation recognises that any pupil who self-harms or expresses thoughts about self-harm and/or suicide must be taken seriously and appropriate help and intervention will be offered at the earliest point. Any member of staff who is made aware that a pupil has self-harmed, or is contemplating self-harm or suicide, will record and report the matter to the DSL as soon as possible as with any other safeguarding concern.

A safety plan will be developed for any pupil at risk of suicide.

### **9.32 Fabricated or induced illnesses**

Staff at The Alwyn and Courthouse Federation are alert to the issues surrounding fabricated or induced illnesses.

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

There are many ways that the parent/carer may fabricate (make up or lie about) or induce illness in a child:

- lying about their child's symptoms
- deliberately contaminating or manipulating clinical tests to fake evidence of illness. For example, by adding blood or glucose to urine samples, placing their blood on the child's clothing to suggest unusual bleeding, or heating thermometers to suggest the presence of a fever
- poisoning their child with unsuitable and non-prescribed medicine
- infecting their child's wounds or injecting the child with dirt or poo



- inducing unconsciousness by suffocating their child
- not treating or mistreating genuine conditions so they get worse
- withholding food, resulting in the child failing to develop physically and mentally at the expected rate.

The very presence of an illness can act as a stimulus to the abnormal behaviour and also provide the parent with opportunities for inducing symptoms.

Fabricated or induced illness is most commonly identified in younger children. Although some of these children die, there are many that do not die as a result of having their illness fabricated or induced, but who suffer significant long term physical or psychological health consequences.

Fabrication of illness may not necessarily result in a child experiencing physical harm, but there may be concerns about the child suffering emotional harm. They may suffer emotional harm and/or disturbed family relationships as a result of an abnormal relationship with their parent.

Staff at The Alwyn and Courthouse Federation will record and report any concerns about a child who might be experiencing fabricated or induced illness to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral or consult with the Single Point of Access as with any other child protection concern.

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

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

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

### **9.34 Pupils with a social worker**

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

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

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

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

### **9.35 Looked after and previously looked after children**

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- The Alwyn and Courthouse Federation has an appointed designated teachers (Wendy Harris for Alwyn Infant School and Fiona Hayes for Courthouse Junior School), who is responsible for

promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

### **9.36 Attendance**

#### **Children subject to child protection plans or child in need (CIN) plans**

The school will ensure that any child currently with a child protection plan or CIN plan who is absent in the educational setting without explanation is referred to their key worker's Social Care Team.

#### **Children considered to be vulnerable**

The school will ensure that any child considered to be vulnerable for any reason who is absent without contact with parents or carers for two days (or sooner depending on the case) will be monitored by a home visit.

#### **All children**

Where reasonably possible, the school seeks and holds more than one emergency contact for all children. Where any child has 5 consecutive school days of unexplained absence and all reasonable steps have been taken by the school to establish their whereabouts without success, the school should make an immediate referral to RBWM's Children Missing Education (CME) Service. Reasonable steps include:

- telephone calls to all known contacts
- letters home (including recorded delivery)
- contact with other schools where siblings may be registered
- possible home visits where safe to do so
- enquiries to friends, neighbours etc. through school contacts
- enquiries with any other service known to be involved with the child/family and
- recording all contacts and outcomes on the child's file.

See Appendix 3 for the Alwyn and Courthouse Federation CME procedures.

Upon receipt of a referral from the School, Windsor and Maidenhead's CME Service will then continue to attempt to track the child. If this also fails to establish the child's whereabouts, the School will be informed to remove the child from roll. If the Windsor and Maidenhead CME Service is able to contact the child and their parents, arrangements will be made with the school and family for a return to education, including a reintegration programme where necessary. If the child has registered at another school, the school will delete the child's name from the roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt requested.

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

If you have concerns about a member of staff (including supply teachers, volunteers or contractors) or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Executive Headteacher. If the concerns/allegations are about the Executive Headteacher, speak to the Chair of Governors.

The Executive Headteacher /Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

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

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

### **10.1 Procedure for dealing with complaints and allegations about staff**

The Alwyn and Courthouse Federation has a whole school approach to safeguarding and we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Despite all efforts to recruit safely, there may be occasions when allegations of abuse against children are reported to have been committed by staff, supply staff, practitioners, other outsider organisations and/or volunteers, who work with pupils in our school.

An allegation is any information which indicates that a member of staff, supply staff or volunteer or other outsider organisations may have:

- behaved in a way that has, 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 they may pose a risk of harm to children.

This applies to any child the member of staff, supply staff or volunteer or other outsider organisations that has contact with in their personal, professional or community life, as if they had child protection concerns raised for their own children.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, school's code of conduct (please insert names of documents as appropriate) and the 'Guidance for safer working practice for adults who work with children and young people in education settings'

Guidance about conduct and safe practice, including safe use of mobile phones by staff, will also be given at induction.

All staff should be aware of name of school's behaviour policy.

All school staff should take care not to place themselves in a vulnerable position with a pupil. It is always advisable for interviews or work with individual pupils or parents to be conducted in view of other adults.

We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the headteacher or the DSL.

The headteacher or the DSL on all such occasions will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours and before taking any further action.

If the allegation made to a member of staff concerns the executive headteacher, the person receiving the allegation will immediately inform the chair of governors who will consult the LADO as above, without notifying the executive headteacher first. Contact details for the chair of governors can be found in section 2 of this policy.

Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by police or Children's Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:

- the vulnerability of children away from home
- the higher standards of conduct demanded by law and regulation of those caring for other people's children
- the position of trust enjoyed by such people

The Alwyn and Courthouse Federation will follow [Keeping Children Safe in Education 2023](#) for managing allegations against staff and procedures.

Suspension of the member of staff, against whom an allegation has been made, needs careful consideration, and the executive headteacher will seek the advice of the LADO and an HR consultant in making this decision. All options to avoid suspension will be considered. In the event of an allegation against the executive headteacher, the decision to suspend will be made by the chair of governors in consultation with the LADO and HR.

If the allegation is regarding supply staff, the school will ensure that allegations are dealt with properly. In no circumstances will the school cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The school will discuss with the agency whether it is appropriate to suspend the supply worker, or redeploy them to another part of the school, whilst they carry out their investigation.

If an allegation pertains to another adult not employed directly by the school, for example catering staff, cleaning staff, peripatetic teachers, sports coaches or a former member of staff, the school will work directly with the employing agency and the LADO as described above.

We will ensure that all external agencies used are provided with details of the school's process for managing information.

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

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. If a teacher is dismissed due to serious misconduct, or might have been dismissed had they not left first, consideration will be given as to whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

## **10.2 Low level concerns**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

The culture of our school is such that staff are encouraged to pass on low level concerns to the DSL or the executive headteacher. These concerns will be recorded and dealt with appropriately.

Ensuring they are dealt with effectively will also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

## **11 Whistleblowing**

The Alwyn and Courthouse Federation has a whistleblowing policy which is available as a separate document. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

Our school works hard to encourage a culture of mutual respect and learning. We welcome comments and feedback and provide staff, pupils and parents with a safe mechanism to raise any concerns.

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, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

In the first instance this should be raised with the executive headteacher, the DSL or the chair of governors. If it becomes necessary to consult outside the school, they should speak to the LADO for further guidance and support.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: 0800 800 5000 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowing issues regarding the headteacher should be raised with the chair of the Governing Board whose contact details are in section 2 of this policy.

## **12 Physical intervention**

The Alwyn and Courthouse Federation promotes a positive environment for all staff, pupils, volunteers and visitors. We have a physical intervention/restraint policy which is available as a separate document. Staff will always employ de-escalation techniques to stop situations escalating and we acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others. At all times, minimal force is used to prevent injury to another person. Staff who are likely to need to use physical intervention will be appropriately trained.

All incidents involving physical intervention will be recorded and signed by a witness.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'safe practice' guidance to ensure they are clear about their professional boundaries.

## **13 Record-keeping**

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

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

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 should move with the child. Files should remain at the last known place of education until the child is 25.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly (within 5 days) and securely, and separately from the main pupil file, confirmation of receipt will be obtained. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

### **13.1 Format**

All staff record concerns or disclosure using a concern form, available from the DSL, either electronically or as a paper version. Records are to be signed and dated by the member of staff making the record. Where possible and without interpretation, the exact words spoken by the child or parent will be recorded. Once completed, the form must be passed straightaway to the DSL who will take further action. The cause for concern form will be scanned or entered onto CPOMS (Safeguarding and Child Protection Software for schools) and the original form shredded.

### **13.2 Storage of records**

All records passed on from other schools must be kept securely, separate from the main Pupil File, and in locked locations. We will hold records in line with our records retention schedule. Non-confidential records will be easily accessible and available. Confidential information and paper records will be held securely in the DSL's office and electronic records will be stored securely in password protection folders on the school server and only available to those who have a right or professional need to see them. CPOMS will be used to record all new information.

### **13.3 When a child leaves the school**

It is the responsibility of the DSL, together with the Executive Headteacher, to ensure that safeguarding and child protection records are transferred to the new school immediately (within 5 days) and separately from the main pupil file. A receipt is obtained and kept on file. The Executive Headteacher and the DSL consider the need to share information about a child with their new school before the child has left on a case by case basis.

## **14 Training**

### **14.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Volunteers will receive appropriate training, if applicable.

#### **14.2 The DSL and deputies**

The DSL and deputies 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 at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

#### **14.3 Governors**

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

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Executive Headteacher, they receive training in managing allegations for this purpose. All governors will read in its entirety Keeping Children Safe in Education, 2023, including annex C.

#### **15 Recruitment – interview panels**

At least one person conducting any interview 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 will be in line with local safeguarding procedures.

#### **16 Monitoring arrangements**

This policy will be reviewed **annually** and approved by the full governing board for the federation.

## **Appendix 1: safer recruitment and DBS checks – policy and procedures**

### **Recruitment and selection process**

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

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

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

### **Shortlisting**

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Conduct an online search
- Explore all potential concerns

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

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

### **Seeking references and checking employment history**

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

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed



- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

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

### **New staff**

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

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

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

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

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

### **Existing staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

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

### **Contractors**

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

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

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

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

All governors will have an enhanced DBS check without barred list information.

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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

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

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

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

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

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

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

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

## Appendix 2: Allegations of abuse made against staff

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

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

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

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

We will deal with any allegation of abuse against a member of staff, supply teacher or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A 'case manager' will lead any investigation. This will be the Executive Headteacher, or the chair of governors where the Executive Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

### Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, 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 Executive Headteacher (or chair of governors where the Executive Headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or Local Authority 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 Local Authority Children's Social Care services, where necessary). Where the police and/or Local Authority 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 Local Authority 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 Local Authority 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 Local Authority Children's Social Care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with Local Authority Children's Social Care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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 governing board/local authority 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**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

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

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### **Individuals returning to work after suspension**

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

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

#### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Executive Headteacher, or other appropriate person in the case of an allegation against the Executive Headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

## **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 Local Authority Children's Social Care services, as appropriate, to agree:

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

## **Record-keeping**

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

Such records will include:

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

## **References**

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

## **Learning lessons**

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

This will include consideration of (as applicable):

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

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

## **Non-recent allegations**

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

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

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

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

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

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

### **Definition of low-level concerns**

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

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

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Maintain our open door policy

### **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 Executive Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the RBWM's code of conduct.

### **Record keeping**

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

Records will be:



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

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

## **References**

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

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

## **Appendix 3: CME Procedures**

If a child is absent and we have not been informed why:

### **Day 1**

Office team to call parents / carers and ask where the child is.

If child has a social worker attached then they must be contacted by the DSL.

For vulnerable children, inform the DSL / Executive Headteacher of the child's absence.

If parents / carers cannot be contacted, office team to log the call in BromCom.

### **Day 2**

Office team to call parents / carers and ask where the child is.

For vulnerable children, text sent to parents / carers stating that the DSL / Executive Headteacher will visit the home to check on the welfare of the child if they do not contact the school by 12.00pm.

Check with local schools for status of siblings.

If parents / carers cannot be contacted, office team to log the call in BromCom.

Home visit for vulnerable children after 12.00pm if there has still been no contact. Risk assessment completed by HT/ DSL. Paperwork filed in safeguarding files (CPOMS).

### **Day 3**

Office team to call parents / carers and ask where the child is.

For all other children, text sent to parents / carers stating that the DSL / Executive Headteacher will visit the home to check on the welfare of the child if they do not contact the school.

If parents / carers cannot be contacted, office team to log the call in BromCom.

### **Day 4**

Office team to call parents / carers and ask where the child is.

Home visit after 9.00am if there has still been no contact. Risk assessment completed by HT / DSL.

Paperwork filed in safeguarding files (CPOMS).

### **Day 5**

Office team to call parents / carers and ask where the child is.

Attendance lead/Senior Leader to make a CME referral to the Borough.