



Partnership Learning

Child Protection & Safeguarding Policy and Procedures

Approved by: Mr Joe Wilson

Date: 1/09/2020

Last reviewed on: 1/09/2020

Next review due by:
September 2021

Contents

1. Aims	2
2. Legislation and statutory guidance	2
3. Definitions	3
4. Equality statement	4
5. Roles and responsibilities	4
6. Confidentiality	8
7. Recognising abuse and taking action	8
8. Notifying parents.....	14
9. Mobile phones and cameras	14
10. Complaints and concerns about school safeguarding practices.....	14
11. Record-keeping	15
12. Training.....	16
13. Site Security.....	16
14. Radicalisation & Prevent Duty.....	17
15. Monitoring Arrangements.....	19
16. Links with other policies.....	19
Appendix 1: types of abuse	20
Appendix 2: safer recruitment and DBS checks – policy and procedures	21
Appendix 3: allegations of abuse made against staff	24
Appendix 4: specific safeguarding issues	28

1. Aims

The Governors and staff of James Cambell Primary School fully recognise the contribution the Child Protection Policy makes to safeguarding the children. We recognise that all staff, including volunteers and visitors, have a statutory duty to make arrangements to safeguard and promote the welfare of children and to keep them safe.

All Staff and Governors believe that our school should provide a caring, positive, safe and stimulating environment which promotes the social, physical, moral and academic development of the individual child.

The school aims to ensure that

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare

- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

The school aims to:

- Support the child's development in ways that will foster security, confidence and independence
- Raise the awareness of Governors', teaching and support staff, volunteers and visitors, of the need to safeguard children and of their responsibilities in identifying and responding to causes for concern in relation to safeguarding.
- Provide a systematic means of monitoring children known or thought to be at risk of harm.
- Emphasise the need for good levels of communication between all members of staff.
- Support a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- Support and promote effective working relationships with other agencies, particularly Children's Services, the Police and health.
- Ensure that all adults within our school who have access to children have been checked as to their suitability.
- Raise awareness and equip the children with the skills needed to keep themselves safe.

2. Legislation and statutory guidance

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

This policy is also based on the following legislation:

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

- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

This policy also complies with our funding agreement and articles of association.

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. 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.

4. Equality statement

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

We give special consideration to children who:

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

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 London Safeguarding Children Board. 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 A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

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

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

Our DSL is Valerie Kinsella. The DSL takes lead responsibility for child protection and wider safeguarding.

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

When the DSL is absent, the deputy –Mr Joe Wilson (Headteacher)/ Rebecca Seaton (Assistant head)

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

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

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

5.3 The governing board

The governing board will approve this policy at each review, and hold the headteacher to account for its implementation.

The governing board will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. This will be the Chair of Governors – Robert Wake.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

5.4 The headteacher

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

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

Responsibilities

The designated staff are responsible for:

- Adhering to the London Child Protection Procedures and school procedures with regard to referring a child/young person if there are concerns about possible abuse or child in need.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from pupil records.
- Ensuring that an indication of further record-keeping is marked on the pupil records.
- Ensuring that if any pupil currently on the child protection register is absent without explanation, that appropriate checks are made.
- Child Protection records will be sent to receiving schools separately and under a confidential cover.

Procedures

- We have a designated senior member of staff (the Child Protection Co-ordinator) who undertakes regular inter-agency training and refresher training.
- We have members of staff who will act in the designated person's absence (the Deputy Child Protection Co-ordinators) and undertake appropriate training.
- All members of staff develop their understanding of the signs and indicators of abuse and have full training at least every 3 years, with some training every year.
- All members of staff know how to respond to a child who discloses abuse.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures and the policy is made available to them.
- Our policy and procedures will be reviewed annually and up-dated.
- All new members of staff will be given a copy of our safeguarding procedures as part of their induction into the school.

All child protection issues are highly confidential. All written documentation will be kept securely in the Inclusion Managers office and all Child Protection issues should never be discussed with anyone other than those named.

Categories of abuse.

We are aware of the categories of Child Protection concerns as follows:

Neglect: The persistent or severe neglect of a child which results in significant impairment of the child's health or development. e.g.

- Failure to provide adequate food, clothing or shelter (including abandonment or exclusion from home)
- Failure to protect from physical or emotional harm.
- Failure to meet child's basic emotional needs.
- Failure to ensure adequate supervision.
- Failure to ensure access to appropriate medical care.

Physical Abuse:

- Deliberate or intended injury to a child. e.g.
- Hitting shaking, throwing, burning, scalding, drowning, suffocating, or poisoning.
- Deliberate inducement of an illness.

Sexual Abuse:

- Actual or likely sexual exploitation. e.g.
- Use of force or enticement to take part in sexual activity penetrative, or non – penetrative.
- Involvement in non-contact activities such as looking at or making abusive images.
- Encouraging children to watch sexual activities.
- Encouraging children to behave in sexually inappropriate ways.
- Any sexual activity with a child under the age of 16. (with or without agreement)

Emotional Abuse:

- Persistent or severe emotional ill treatment or rejection which adversely affects the child's emotional and behavioural development. e.g.
- Conveying to a child that they are worthless, unloved or inadequate.
- Overprotection, limiting exploration and learning, preventing normal social interaction or imposing inappropriate expectations.
- Causing a child to feel frightened or in danger by the witnessing of violence towards another person whether domestic or not.

Signs and Symptoms of abuse / neglect

At The James Cambell Primary School we develop close working relationships with our pupils and often get to know them very well. We endeavour to be vigilant in spotting possible symptoms or signs of abuse and neglect and are aware that the following list, while useful, is not exhaustive. However, we are mindful that it can be extremely difficult to determine if abuse has occurred. Staff should look carefully at the behaviour of their children and be alert for significant changes. Staff should be aware that children may exhibit any of the following without abuse having occurred:

- Disclosure.
- Non accidental injury, bruising or marks.
- Explanation inconsistent with injury.
- Several different explanations for an injury.
- Reluctance to give information about an injury
- A sudden change in behaviour – aggression, extroversion, depression, withdrawn.
- Attention seeking
- Hyperactivity
- Poor attention
- Appear frightened of parents or family members
- Abnormal attachment between parent and child
- Indiscriminate attachment
- Hyper alertness.
- Reduced response.
- Frozen watchfulness.
- Nightmares.
- Anxiety/irritability.
- Abdominal pain/headaches.
- Poor self-esteem.
- Poor peer relationships
- Act in an inappropriate way for age
- Over sexualised play/talk or drawings.
- Excessive or inappropriate masturbation
- Self-harm/eating disorder
- Frequent visits to the toilet (urinary infection).
- Reluctance to change for P.E.
- Failure to thrive
- Poor hygiene
- Recurrent/untreated infections of skin or head lice
- Untreated health/dental issues
- Frequent absence from school or repeated lateness
- Delay in meeting normal developmental milestones

6. Confidentiality

All child protection issues are highly confidential. All written documentation will be kept securely in the Inclusion Managers office and all Child Protection issues should never be discussed with anyone other than those named.

- We recognise that all matters relating to Child Protection are strictly confidential.
- The Designated senior members of staff will disclose any information about a pupil to other members of staff on a need to know basis.
- All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff are aware that they cannot promise a child to keep secrets.
- Concerns are recorded on the cause for concern form and handed to the Designated Safeguarding Lead in confidence. (Blank copies are available in the staff rooms and in electronically in staff folder.)

7. Recognising abuse and taking action

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

Overview of procedures.

One of our Main responsibilities under 'Duty of Care' and the new 'Safeguarding Children's regulations' and 'Keeping Children Safe' is Child Protection.

Actions to be taken if a child is thought to be 'at risk'

- The rule 'believe first' is to be rigidly applied, particularly in cases of suspected child abuse.
- Anything you see or hear must be reported immediately.
- Any disclosure by a child must be reported immediately.
- You must never interrogate the child, as this may prejudice any action that might be subsequently taken but questioning a child by a teacher/ support staff would be expected.
- Any concerns must be reported to the designated lead **Valerie Kinsella**. If the Lead is not available then to the Deputy Lead – **Joe Wilson or Rebecca Seaton**
- On the rare occasion that none of the above are available then contact Assistant head teacher for advice.
- If none of the above can be contacted then contact Children's Services direct. Their number is located on the Inclusion Managers wall or on the Safeguarding board in the staffroom.
- **Never leave a child protection concern to the following day.**
- When a concern is passed to the designated lead or deputy lead then:
 - a) They will ensure information is gathered.
 - b) Liaise with appropriate staff
 - c) Make a decision as to whether to refer to Children's Services or to monitor the situation.
 - d) Inform appropriate staff of the decision made.
- If a decision is made to refer the concern to Children's Services then the Lead will follow the procedure:
 - a) Referrals to Social Care will always be made by either the **designated lead or the deputy designated leads**.
 - b) Referrals should be made initially by telephoning the duty Referrals Social Worker, this should then be followed up in writing on a "Multi-Agency Referral Form" (MARF) which should be emailed to Children's Services within 24 hours. Children's Services expect it within 48 hours at the latest.
 - c) If perceived risk in more urgent the duty social worker will advise to email immediately
 - d) Where practicable, **if there is no immediate risk to the child** concerns should be discussed with the parent / carer and agreement sought for a referral to be made, **unless seeking agreement is likely to place the child at risk of significant harm through delay or the parents' actions or reactions**.
 - e) Where a professional decides not to seek parental permission before making a referral, the decision must be recorded in the child's file with reasons, dated and signed and confirmed in the referral to Social Care.
- In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the Safeguarding referral process should not delay the administration of First Aid or emergency medical assistance. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental

Responsibilities and action in a suspected case of abuse or neglect

Suspicion of Abuse (In the event of noticing a mark or bruise, or perhaps a child who has been behaving differently, when abuse is suspected but there has been no disclosure.)

1. It would be appropriate to ask open questions about the nature of the concern, e.g. bruises, marks, change in behaviour etc. "How did that happen? I've noticed that...Can you tell me about..."
2. Believe the child and reassure them that they were right to talk to you. Explain that you will be passing on the concern.
3. Record the facts and conversation in writing on a "Child Protection Concern" form (available from the shared staff area under proformas, staffroom or at the back of the safeguarding policy) at the earliest opportunity afterwards using the exact words spoken not implied. Please ensure you sign and date the form.
4. Report the suspicion to the Designated Person responsible for Child Protection, the Deputy designated person or the Head teacher. The Designated Person, Deputy designated person or Head teacher will take the appropriate action.

Disclosure (When a child discloses abuse or neglect.)

1. Allow the child to talk – ask only open questions to clarify concerns e.g. "Can you tell me more about..." Do not press for detail, put forward your own ideas or use words that the child has not used themselves.
2. Stay calm and reassuring. E.g. "Well done, you're doing well... You've done nothing wrong".
3. Do not make promises that cannot be kept e.g. confidentiality – tell the child that you will have to tell someone else who will be able to help.
4. Believe the child but do not apportion any blame to the perpetrator. (It may be someone they love)
5. Reassure the child that they were not to blame and they were right to talk to you. Explain that you will be passing on the concern.
6. Ask the child if they have told anyone else.
7. Keep an open mind.
8. Record the conversation and facts verbatim immediately afterwards on **Safeguard**
9. Report to the Designated Person or Deputy Designated Person or as soon as possible.
10. If a case is urgent then verbally report first.
11. If access to Safeguard is not possible at the time then record on paper using the 'Incident Record/ Cause for Concern form'

Child Sexual Exploitation

We are vigilant about risks of child sexual exploitation and refer to the recent guidance;

"What to do if you suspect a child is being sexually exploited." (DFE, 2015)

We are aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour;

Practitioners should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

In any such case, concerns will be discussed with one of the CP Leads.

Female Genital Mutilation

We are also vigilant about the risk and potential likelihood of female genital mutilation (FGM). We refer to the guidance; "Multi-Agency Practice Guidelines: Female Genital Mutilation":

SPECIFIC FACTORS THAT MAY HEIGHTEN A GIRL'S OR WOMAN'S RISK OF BEING AFFECTED BY FGM

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from Personal, Social and Health Education or Sex and Relationship Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

INDICATIONS THAT FGM MAY BE ABOUT TO TAKE PLACE SOON

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is new-born, during childhood or adolescence, at marriage or during the first pregnancy.**

FGM happens to British girls in the UK as well as overseas.

INDICATIONS THAT FGM MAY HAVE ALREADY TAKEN PLACE

It is important that professionals look out for signs that FGM has taken place so that:

- The girl or woman affected can be supported to deal with the consequences of FGM.
- Enquiries can be made about other female family members who may need to be safeguarded from harm.
- Criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

There are a number of indications that a girl or woman has been subjected to FGM:

- A girl may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl be particularly reluctant to undergo normal medical examinations.

- A girl may confide in a professional.
- A girl may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

Any concerns about pupils at risk of experiencing, or already having experienced FGM, should be reported to one of the CP Leads.

Allegations of abuse made against other pupils

We take any allegations seriously, including when they are about pupils within the school. If such an allegation is made we would consider our response in light of child protection guidance, as to whether it warrants a referral to Children's Social care for the perpetrator. If this is not the case, we would support at a school level, which may involve liaison with the child's parents, referral to our school Nurture Group, or further support in school.

Supporting Children

We recognise that a child who is abused or witnesses domestic violence/abuse may find it difficult to develop and maintain a sense of self worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self-blame and guilty.

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

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

Our school will support all children/young people by:

- Developing self-esteem and self-assertiveness whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Children's Services as soon as there is a significant concern.
- Providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded, under confidential cover, to the child/young person's new school.

Supporting Staff

- We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the designated lead or Deputies and to seek further support as appropriate.

Physical Intervention

- Our policy on physical intervention/positive handling by staff is set out in a separate document and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury to another person.

- Where physical intervention is deemed necessary it is recognised that where possible this will be conducted with the support of another adult.
- We understand that physical intervention of a nature which causes injury or distress to a child/young person may be considered under child protection or disciplinary procedures.

Bullying

- Our policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

Racist Incidents

- Our policy on racist incidents is set out in the Equal Opportunities policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

Prevention

We recognise that the school plays a significant part in the prevention of harm to our pupils by providing them with good lines of communication with trusted adults, supportive friends and an inclusive, positive and protective ethos.

The school community will therefore:

- Establish and maintain an ethos where children/young people feel secure and are encouraged to talk and are always listened to.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include in the Curriculum opportunities for PSHE which equip pupils with the skills they need to stay safe from harm and to know to whom they should turn for help.

Photography and Videoing

We obtain written consent from parents on entry to school to take photos and videos of children in school. Where consent is not given, what is recorded is kept on the child's central file. Such photos and videos may be used to support children's learning, for training or promotional purposes.

Internet Safety

Our policy on e-safety is set out in a separate policy which recognises and actively promotes e-safety.

Attendance

Our policy on attendance is set out in a separate policy which recognises the expectation of excellent attendance for all our children.

Health & Safety

- Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the welfare and protection of our children both within the school environment and when undertaking school trips and visits.
- Each term there is a fire drill that practices efficient evacuation from the buildings. The school conducts an annual Fire Risk Assessment.
- There is a critical incidents plan that details what staff and parents should do in case of emergencies.

8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

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

9. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

10. Complaints and concerns about school safeguarding practices

Complaints/Allegations against staff

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

- We understand that a pupil may make an allegation against a member of staff.
- If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher.
- The Headteacher on all such occasions will discuss the content of the allegation with the LA Lead Officer for Child Protection- the LADO.
- If the allegation made to a member of staff concerns the Headteacher, then the concern should be reported to the designated lead or deputy headteacher who will immediately inform the Chair of Governors who will consult with the LAs Lead Officer for Child Protection.
- The school will follow the LA procedures for managing allegations against staff, a copy of which will be readily available in the school.

Whistleblowing

Our policy on Whistleblowing is set out separately.

- We recognise that children/young people cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Any concerns should be raised with the Child Protection co-ordinator/ Headteacher.

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

- We hold paper and electronic records
- Records are held in a secure office with limited access to staff/parents/visitors
- Paper Records are kept in locked drawers/electronic records are password protected.
- The school will hold the information for a period of 6 years

In addition:

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

12. Training

All staff

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

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 (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

The DSL and Deputy

The DSL and deputy 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.

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.

Recruitment – interview/appointment panels

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

Appointment of New Staff

Our Safer Recruitment policy, set out in a separate document, acknowledges our responsibility for protecting children from unsuitable people through safe recruitment practises. The Head Teacher/ Deputy Head Teacher and Designated Safeguarding Lead have completed relevant safer recruitment training.

Induction of volunteers

- Volunteers must also have DBS clearance. For a brief activity, such as a school visit, which does not involve the supervision or close contact of children the school may telephone for a "99" check.
- For extended contact with children, when children may be left alone with an adult, or when an adult visitor may be in and around the school building a full DBS search will be conducted. The office performs this. Visitors who do not yet have clearance will under no circumstance be left alone with a child or group of children.

Staff who have contact with pupils and families

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

First Aid

- There are trained members of staff who volunteer to oversee first aid.

There is a clear protocol when an accident occurs:

- Trained first aider is consulted
- Incident is logged in the accident book/accident form completed and placed in the child's file.
- For head injuries, if in doubt a parent/carer is contacted.
- Asthma pumps are held in the classrooms. Pupils have supervised access and records are kept of their use. Parents are welcome to come to school to administer correct dosages of medication during the day.
- Children with more complex medical needs will be subject to a Health Care Plan which will be overseen by the inclusion manager and the school nurse.

To ensure the safeguarding of pupils with special educational needs and disability (SEND), the school facilitates training and guidance of safe handling for specific staff. Most support staff are trained to deliver specific targeted interventions to identified groups and individual pupils

13. Site Security

The James Cambell Primary School provides a secure site, which is controlled by precise management directives, but the site is only as secure as the people who use it. Therefore all people on the site have to adhere to the rules, which govern it. Laxity can cause potential problems to safeguarding. Therefore:

- Gates will be closed except at the start and end of each day.
- Doors should be closed to prevent intrusion but still facilitate smooth access.
- Visitors and volunteers must only enter through main entrance and sign in and out.
- Unidentified visitors will be challenged by staff and reported to the Head/Deputy teacher.
- Pupils will only be allowed home with adults with parental responsibility or confirmed permission otherwise. Siblings under 16 are not allowed to collect pupils.
- Empty classrooms should have closed windows.
- Children should never be allowed to leave school alone during school hours. If collected by an adult they are required to report to the office.

Welcoming visitors

It is assumed that visitors with a professional role i.e. the School Nurse or members of the police already have relevant clearance but the office will endeavour to check this before admittance is granted and a note made of anyone entering without clearance. (See also Site Security).

14. Radicalisation & Prevent Duty

Radicalisation and Prevent Duty

- Protecting children from the risk of radicalisation is part of schools wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.
- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings.
- The Counter-Terrorism and Security Act 2015 places a duty on school staff to have due regard to the need to prevent people from being drawn into terrorism. Known as the Prevent Duty.
- School staff should use their professional judgement in identifying children who might be at risk of radicalisation or extremism and report any concerns to the Designated Safeguarding Lead.

Children who are Looked After

- All looked after children have a Personal Education Plan (PEP) which is part of the child's care plan.
- The designated teacher for the looked after children is, **Valerie Kinsella**. Through liaising with the virtual school teacher, social worker and the foster carer, the school ensures that there are appropriate arrangements in place to meet the educational needs and training needs of staff for promoting the educational achievement of looked after children. A personal education planning (PEP) takes place each term and the LAC review meeting takes place at least twice a year to review the progression and to set appropriate provision to safeguard the best learning outcome.

Children Missing Education

- Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

- The attendance lead will monitor unauthorised absences and take appropriate action including notifying access and attendance lead and the local authority. This information will be shared with the DSL.
- Staff must be alert to signs of children at risk of traveling to conflict zones, female genital mutilation and forced marriage.

Peer on peer abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence,⁶ such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;

Pupils conduct will be covered in our behaviour policy. However, some allegations may be of a more serious nature and may raise safeguarding concerns. At James Cambell we recognise that children are capable of abusing their peers. The forms of peer on peer abuse are outlined below:

- Domestic abuse- an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former partner.
- **Child Sexual Exploitation**- children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- **Harmful Sexual Behaviour**- children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence- Any offence of most serious violence or weapon enable crime, where the victim is 1-19
- There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being touched sexually or/and by being subject to initiation)
- **Upskirting**, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; ⁸ which
- **Sexting** (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.
- The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery. Such imagery involving anyone under the age of 18 is illegal.

All incident of this nature should be treated as safeguarding concern

Classes where sexual imagery of people under 18 has been shared by an adult to a child is child sexual abuse and should be reported accordingly.

- At James Cambell we aim to reduce the likelihood of peer on peer abuse through:
 - The established ethos of respect, friendships, courtesy and kindness.
 - High expectations of behaviour
 - Clear consequences for unacceptable behaviour

- Providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe. Supporting pupils to understand how to support their friends if they are concerned about them, that they should talk to a trusted adult within the school.
- Systems for any pupils to raise concerns with staff, knowing that they will be listened, valued and believed

Risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Any concerns, disclosures or allegations of peer on peer abuse should be referred to the DSL and usual procedures to be followed.

Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the other pupils affected and the victim and perpetrator will be provided with support.

Serious violence

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

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

15. Monitoring arrangements

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

16. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

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

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

Appointing new staff

When appointing new staff, we will:

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

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

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

Regulated activity means a person who will be:

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

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

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

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

Governors

- All governors will have an enhanced DBS check without barred list information and section 128 check *[section 128 checks are only required for local governors if they have been delegated any management responsibilities]*

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

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

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

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

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

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

Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or

- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

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

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

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

Suspension

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the 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 children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social

care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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 National College for Teaching and Leadership.

Where the police are involved, wherever possible the academy trust 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.

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL 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 headteacher, or other appropriate person in the case of an allegation against the 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

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

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

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

Record-keeping

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

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

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

Appendix 4: Specific safeguarding issues

Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

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

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

- Come from new migrant families

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

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

FGM

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

Section 7 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff/

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

Non-collection of children

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

Contact the parent/s to find out why the child has not been collected. If there is no answer we will contact the next emergency contact on the child's file. In the event that we are unable to contact either the parent or emergency contact by 5pm we will then contact the **local police?**

Missing pupils

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

Parent support advisors will try to make contact with the family to obtain information about where the child is. If the PSA's are unable to make contact by telephone they will perform a home visit. If they are still unable to contact a parent/emergency contact to verify the whereabouts of a child, they will notify the DSL who will then follow the procedures in place.