

Fosse Bank School Safeguarding Policy

April 2022

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1. APPLICATION

This policy is applicable to all pupils in the school, including those in the EYFS. Whenever the word 'staff' is used it refers to all members of staff, governors, self-employed staff, staff employed by a third party, supply staff, contractors, volunteers, students and those on work experience. It applies whenever staff or volunteers are working with pupils, including when this is away from the school, for example on an educational visit. This policy has been adopted by the governors, is addressed to all members of staff and volunteers, is available to parents on request and is published on the school's website.

2. KEY CONTACTS

2.1 The School

	Name	School contact information
Designated Safeguarding Lead (DSL) Head (Including responsibility for EYFS pupils)	Alison Cordingley Head	acordingley@fossebankschool.co.uk 07711 782 973
Deputy Designated Safeguarding Lead Deputy Head	Shiralee Baumhauer Deputy Head	S.Baumhauer@fossebankschool.co.uk 07704 143502
Deputy Designated Safeguarding Lead SENCO	Barbara O'Hara SENCO	B.Ohara@fossebankschool.co.uk
Early Years Designated Safeguarding Lead	Claire Sands Early Years Manager	csands@fossebankschool.co.uk 07702564194.

2.2 The Local Authority

The school is situated in Kent and follows the local procedures of the Kent Safeguarding Children Multi-agency Partnership. <https://www.kscmp.org.uk/>

CONCERNS ABOUT A CHILD

If a child is in immediate danger contact the Police on 999.

Referrals about a child contact:

Integrated Children's Service

Front door 03000 411 111

Out of Hours Number: 03000 419 191

Contact details for Area Safeguarding Advisor (Education Safeguarding Service)

- 03000 411111
- www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts

Contact details for Online Safety in the Education Safeguarding Service

- 03000 415797
- esafetyofficer@theeducationpeople.org (non-urgent issues only)

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

- kscmp@kent.gov.uk
- 03000 421126

Prevent Education Officers

South/East - Jill Allen jill.allen@kent.gov.uk 03000 413565

CONCERNS ABOUT THE CONDUCT OF AN ADULT

Safeguarding concerns about the conduct of an adult must be made to the Local Authority Designated Office (LADO) for Kent.

Contact details for the LADO

- Telephone: 03000 410888
- Email: kentchildrenslado@kent.gov.uk

3. INTRODUCTION AND ETHOS

- Fosse Bank School recognises its statutory responsibility to safeguard and promote the welfare of all children.
- Safeguarding is everybody's responsibility and** all those directly connected (staff, volunteers, governors, leaders, parents, families and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- Everyone must ensure that their approach is child centred: this means considering at all times what is in the best interests of the child.
- Staff working with children at Fosse Bank School **are advised to maintain an attitude of 'it could happen here'** where safeguarding is concerned.
- Fosse Bank School believes that every pupil should feel safe and protected from any form of abuse, neglect or exploitation, including through the use of technology.
- All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Fosse Bank School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. All children are respected and encouraged to talk openly.
- All our staff understand safe professional practice and adhere to the school's Child Protection Policy and other associated policies.
- Our core safeguarding principles are:
 - **Prevention**
positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

- **Protection**
following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support**
for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
 - **Working with parents and other agencies**
to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- j) Fosse Bank School expects that if any member of our community has a safeguarding concern about a child or a concern about the conduct of an adult, they should act, and act immediately, by following the procedures laid down in this policy.
- k) Fosse Bank School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. (see Appendix 1 paragraph 2.9)
- l) Fosse Bank School recognises that in situations where there are immediate child protection concerns, it does not investigate as a sole agency but acts in line with Kent SCMP guidance which involves multi-agency decision making.

4. LEGAL FRAMEWORK & RELATED SCHOOL POLICIES

This policy pays due regard to:

- Keeping Children Safe in Education DfE guidance, September 2021
- Working Together to Safeguard Children (WT) (2018 updated December 2020)
- Statutory Framework for the Early Years Foundation Stage (September 2021)
- Kent Safeguarding Children Multi-agency Partnership Thresholds and Procedures
- The Education (Independent School Standards) Regulations (2014)
- The Prevent Duty Guidance (2015 updated 2021) (Prevent Duty)
- DfE statutory guidance 'Disqualification under the Childcare Act 2006' (February 2015)

A full list of statutory and other guidance which has informed this policy may be found below in Paragraph 29.

4.1 Related school policies

Other school policies are integral to the school's overarching approach to safeguarding and link closely with this policy.

These include but are not limited to:

- EY specific policies.
- Behaviour management, (Including the use of physical intervention)
- Searching, screening and confiscation
- Online Safety; Social media and Mobile technology
- Behaviour Policy
- Children missing in Education
- Attendance Policy
- Anti-Bullying
- Data protection and Information sharing
- Image use
- Relationship and Sex Education (RSE)
- PSHCE Policy
- Personal and intimate care
- Health and safety, including plans for school and Covid 19
- Attendance
- Risk assessments

- First aid and accidents
- Managing allegations against staff
- Staff Code of Conduct, including Acceptable Use of Technology Policies (AUP)
- Safer recruitment

5. KEY RESPONSIBILITIES

5.1 Governing Body

- To ensure their understanding of KCSIE 2021.
- To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- To ensure there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters. (Contact details are shown in paragraph 2 on Key Personnel.)
- To ensure the nominated governor has the required knowledge, skills and expertise to take leadership responsibility for the school's safeguarding arrangements.
- To ensure that the Designated Safeguarding Lead is supported in their role
- To ensure there is an effective Safeguarding Policy in place, which is consistent with KCSIE (2021) and the requirements of Kent SCMP.
- To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare.
- To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the school.
- To ensure that the school holds at least two emergency contact numbers for each child.
- To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in the school's Single Central Record (SCR).
- To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes
- To have policies and procedures in place regarding pupils accessing the internet in school
- To have policies and procedures in place relating to the use of cameras and technology, including within the EYFS.
- To review the Safeguarding Policy at least annually, including an update and review of the effectiveness of procedures and their implementation.

5.2 Designated Safeguarding Lead (DSL) and deputies

- The school has appointed a member of the leadership team (Alison Cordingley, Head) as the Designated Safeguarding Lead (DSL). Additionally, the school has appointed Deputy DSLs Shiralee Baumhauer, Also Barbara O'Hara and Claire Sands.
- During term time, the DSL and/or the Deputy DSLs are available during school hours, either in school, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns. During Holiday Club, a DSL is always available.
- The DSL has overall responsibility for the day to day oversight of safeguarding and child protection systems in school including on-line safety.
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

DEPUTY DSLs

The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on her return.

It is the role of the DSL to:

- To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the

- school's processes and procedures
- b) Act as the central contact point for all staff, parents and external agencies to discuss any safeguarding concerns
 - c) To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes
 - d) Maintain records for all safeguarding and child protection concerns, including including a clear chronology, decisions made and action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
 - e) Coordinate safeguarding action for individual children and provide a systematic means of monitoring and supporting pupils known or thought to be at risk of harm or where there are ongoing concerns
 - f) When supporting children with a social worker or looked after children the DSL maintains the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher).
 - g) Liaise with other agencies and professionals in line with KCSIE 2021 and WTSC2020.
 - h) Ensure that locally established procedures as put in place by the three safeguarding partners(KSCMP), including referrals, are followed, as necessary.
 - i) Represent, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
 - j) Manage and monitor the school role in any multi-agency plan for a child.
 - k) Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
 - l) 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.
 - m) Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
 - n) Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2021) and Kent SCMP
 - o) To ensure that when pupils leave the school any child protection information is copied for the new school within 5 days and transferred securely and separately from the main file
 - p) To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the school
 - q) To ensure the Child Protection Policy is reviewed annually in conjunction with the Governors, such review to include its effectiveness in practice
 - r) To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
 - s) To be responsible for overseeing online safety in the school with the support of the school's IT manager, Helen Wood (ICT Network Services Ltd).
 - t) To ensure the Safeguarding Policy is available on the school's website
 - u) To ensure a termly report is sent to the Safeguarding Governor and an annual Safeguarding Audit is presented to the Governing Board.

5.3 Members of staff

All members of staff have a responsibility to:

- a) Provide a safe environment in which children can learn
- b) Read and understand, Part 1 of Keeping Children Safe in Education and Annex B and the school's Child Protection Policy
- c) Adhere to the school's Staff Code of Conduct
- d) Understand the early help process and their role in it.
- e) Understand the school safeguarding systems including TAG, worry boxes, Trusted Adult to talk to, how to use Childline.
- f) Undertake appropriate training which is regularly updated, at least annually.
- g) Know that they can make a referral to Children's Services directly if necessary and how to do this.
- h) To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.

- i) To be alert to the signs of abuse and neglect, including all forms of peer on peer abuse, and to report any concerns to the DSL immediately and record concerns on CPOMS.
- j) To know what to do if a child reports that he or she is being abused, exploited or neglected and understand the impact abuse and neglect can have upon a child.
- k) To have with them, the 'do and don't' card as a reminder of what to do if a child makes a disclosure.
- l) Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- m) Recognise that even if pupils do not report abuse, including peer on peer abuse, that does not mean it is not happening.
- n) Know the importance of challenging any abusive behaviour between peers including name calling.
- o) Know the procedures to minimize the risk of peer-on-peer abuse i.e. openness, someone to talk to, part of PSHCE/RSE lessons.
- p) Know how to maintain an appropriate level of confidentiality.
- q) Help pupils understand how to keep themselves safe and manage risk, including online
- r) To be alert to absenteeism of any pupils and to inform the DSL of any concerns.
- s) To consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding)
- t) To report to the Head any concerns about the conduct of adults, including low level concerns (this includes behaviour outside school that might indicate an individual is unsuitable to work with children)

5.4 The Head

The Head of the school is also the DSL. However, she has additional safeguarding responsibilities as Head of the school. These duties include:

- a) To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- b) To ensure pupils are taught about keeping safe, including online
- c) To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- d) To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns
- e) to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults
- f) To undertake training on safer recruitment processes at regular intervals
- g) To monitor the effectiveness of this policy and its procedures in liaison with the Governors and to remedy any deficiencies immediately.
- h) To ensure staff are recruited in line with Part Three of KCSIE (2021)

6. STAFF INDUCTION AND TRAINING

6.1 Induction

The DSL is responsible for ensuring that all new members of staff working in school, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Keeping Children Safe in Education, Part 1 and Annex B
- Safeguarding Policy
- Staff Code of Conduct
- Digital Usage Policy;
- Whistleblowing Policy
- Behaviour Policy
- Anti-bullying Policy
- Prevent training
- Procedures on managing children who go missing from education (in Attendance Policy)

- How to report concerns about pupils and about the conduct of adults

The school takes a risk based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers.

6.2 Ongoing Staff Training

- At the start of every academic year, all members of staff are provided with a copy of the most recent edition of part of Part 1 'Keeping Children Safe in Education' and Annex B and the school's Child Protection Policy.
- Staff must sign to confirm that they have read and understood these documents. A record of this is kept by the Head.
- Due to their additional responsibilities, School leaders, including the DSL are required to be familiar with all parts of KCSIE.
- Staff renew their Prevent training periodically.
- Every member of staff receives comprehensive training in safeguarding (including on-line safety) at least every three years, in line with advice from Kent SCMP.
- In addition to this specific child protection training, at least annually, all staff receive regular safeguarding and child protection updates via inset days, email, e-bulletins and staff meetings to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff are trained in how to listen, respond to and report any disclosures including those which involve all forms of peer on peer abuse, including sexual violence and/or sexual harassment.
- Staff are reminded regularly of the Child Missing Education Policy
- Annually, all staff members (including agency and third-party staff) are made aware of the school's expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Policy (AUP).
- Staff are encouraged to contribute to and shape school safeguarding arrangements and policies related to child protection: by discussion and inviting input at staff meetings.

6.3 DSL Training

The DSL and Deputy DSLs undergo training as a minimum every two years, which includes training in inter-agency working in line with Annex C of KCSIE and appropriate and specific training to provide the knowledge and skills required to carry out their roles, including the Prevent duty.

Deputy DSLs are trained to the same standard as the DSL. The training of the DSL and deputies is also updated through a variety of methods at regular intervals, and at least annually.

6.4 Training for Governors

All governors receive safeguarding training when they are recruited to the Board. This is updated annually. The governor responsible for safeguarding has received additional safeguarding training and undertakes refresher training every two years, as a minimum.

7. USE OF MOBILE PHONES, CAMERAS AND OTHER DEVICES, INCLUDING WITHIN THE EYFS

- Staff must not carry or use personal mobile phones or devices when working with children.
- Personal mobile phones must remain out of sight in a classroom cupboard or in the class locked cabinets but may be removed during staff break periods.
- Staff may use their mobile phones during break/lunchtimes in agreed areas, not accessed by children.
- Staff should provide the school phone number for contact during emergencies.
- Personal mobile phones must not be used to contact Fosse Bank families under any
- circumstances. Communication should take place using the office phone, work email, EEXAT, or at drop off and pick up times.

- g) The EYFS Manager/Deputy or Forest School Lead will keep a mobile phone/walkie-talkie in the outdoor learning environment for emergencies (e.g. lockdown procedures/health emergencies/act as wi-fi device).
- h) A school mobile phone must be taken on all journeys away from the main setting.
- i) Staff must not take video footage or photographs of pupils except for school purposes.
- j) Any such images must not be placed in the public domain without the permission of the Head.
- k) Personal mobile phones are not permitted in the children's bathroom under any circumstances nor in any areas where pupils may be washing or changing.
- l) Photography must not be used in a manner that may offend or cause upset.
- m) Parents are asked to restrict photography whether on cameras, mobile phones or other devices to major school events published in the school calendar only. General filming in school by parents is never permitted.
- n) Parents should be aware that other parents in the school may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on any social media platform.
- o) Other visitors, volunteers and contractors in school are not permitted to take photographs in any area of the school without specific permission from the Head.
- p) The general use of mobile telephones in all areas of the school (calls, texting and email) by parents and visitors is not permitted.
- q) Any concerns around personal mobile phone usage should be reported to the Designated Safeguarding Lead.
- r) If, occasionally, a personal device is used, such as on a school outing, any photographs or videos of pupils must be uploaded to the school's system as soon as possible and permanently deleted from the personal device. This is acceptable only if the DSL is informed first.
- s) A personal phone with a school simcard and not linked to the primary personal phone in it is acceptable if the DSL is informed.

7.1 Pupils' mobile phones

- a) Older pupils who can demonstrate a clear need for a mobile phone (such as for security when walking to and from school) may bring one into school.
- b) Pupils' phones must be handed in to the School Office at the start of each day and collected at home time. Access to the phone during the day is not permitted.

8. RECOGNISING INDICATORS OF ABUSE AND NEGLECT

- a) All staff in school are made aware of the definitions and indicators of abuse and neglect as outlined in Keeping Children Safe in Education 2021 and further specific safeguarding issues as detailed in KCSIE Annex B.
- b) Staff are uniquely placed to observe outward signs of neglect or abuse, unexplained changes in behaviour or failure to develop.
- c) Children who are victims of abuse often display emotional and behavioural difficulties and it is more common for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure.
- d) Staff may witness a change in a pupil's behaviour or art or written work may show signs of distress. Staff should be aware that younger pupils may talk about, or demonstrate behaviour, through their play which gives rise to safeguarding concerns

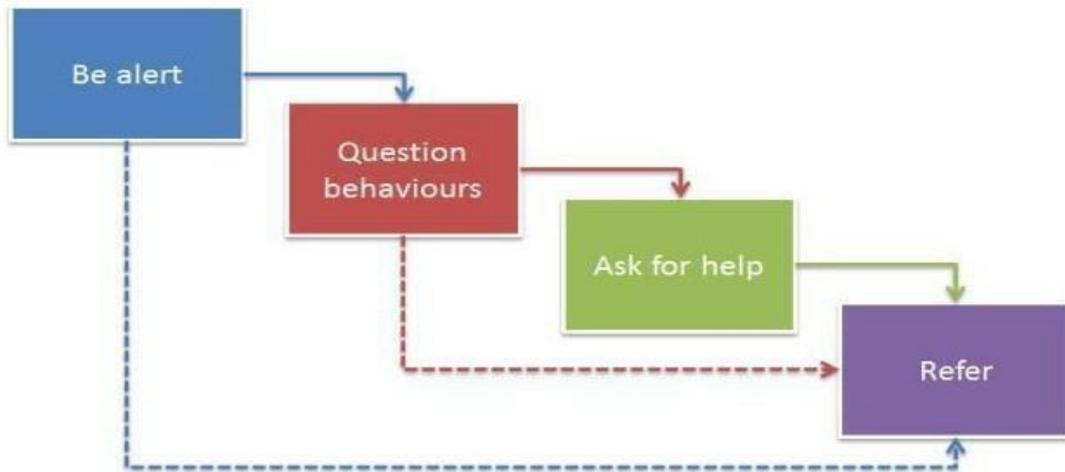
- e) Parental behaviors' may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or who have mental health difficulties.
- f) Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child may be more normal for an older child.
- g) All staff understand, that even if there are no reports from pupils in the school about abuse, including peer on peer abuse, it does not mean abuse is not happening, it may be the case that it is just not being reported.
- h) It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused, however, all concerns should be taken seriously and reported to the DSL who will assess matters on a case by case basis.
- i) Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children offsite. Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- j) By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

Appendix 1 of this policy gives further details of the categories of abuse, neglect and other specific safeguarding issues with which staff should be familiar.

9. WHAT STAFF SHOULD DO IF THERE ARE CONCERNS ABOUT A CHILD

If a member of staff has any concerns whatsoever about a pupil the matter should be referred to the DSL, or the deputy in the DSL's absence, immediately. In many safeguarding cases it is not one major incident which triggers a referral, but a series of what appears to be more minor events. It is therefore vitally important that all events are reported and recorded on CPOMS.

All members of staff are expected to be aware of and follow this approach:



'What to do if you are worried a child is being abused' 2015

In all instances, a written record must be made by the member of staff on CPOMS. This applies to any concerns or a safeguarding concern.

9.1 Dealing with a disclosure by a pupil

It takes courage for a child to disclose that they are being neglected and/or abused. They may feel ashamed, their abuser may have threatened them or they may believe, or have been told, that the abuse is their fault.

If a child discloses any concerns to their safety or wellbeing the following procedure should be followed:

- **Listen to the pupil**, take their allegation seriously and reassure them that you will take action to keep them safe.
- **Remain calm** and do not over-react – the child may stop talking if he/she feels you are upset.
- **Do not interrupt** the first account is usually the most accurate. Offer reassuring nods or words of comfort eg “I want to help,” “You are doing the right thing in talking to me”.
- **Do not make notes as the child speaks**. This may inhibit what the child says and takes the focus off the child.
- **Do not guarantee confidentiality**; referrals may have to be made in order to safeguard the pupil. At an appropriate time tell the child that in order to help them you will need to consult others.
- **Do not cross-question the pupil**. Any questions must be as open as possible and must not lead the pupil. Let the pupil tell what he/she wants and no more. Do not ask ‘leading’ questions such ‘Was it X who did this to you? Is it true that ...?’ Say ‘Tell me what happened. What happened next? The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the pupil to become anxious and retract their information.
- **Tell the child what will happen next**. That the DSL will talk to him/her and will decide how best to help.

- **Report orally to the DSL as soon as possible.** If the DSL is not available, report to the Deputy DSL.
- **Keep the matter confidential** and do not discuss the matter with anyone other than the DSL.
- **Make a written note of the discussion as soon as possible** and at the latest before the end of the day on CPOMS with an alert sent to DSLs. Note time, date, place, people present and what was said. Be specific using the child's own words as much as possible.
- **Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury.
- **Do not investigate further** or speak to anyone else about what you have been told; your role is to listen, record and report concerns to the DSL.
- **Seek support** if you feel distressed.

9.2 Recording safeguarding concerns

- a) Staff may initially discuss a concern about a pupil with the DSL; however, whether discussed first or not, all concerns must be recorded in writing. A body map should also be completed if injuries have been observed.
- b) If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- c) Records are kept on CPOMS and must be completed as soon as possible after the incident/event, using the child's own words and an alert sent to DSLs.
- d) If there is an immediate concern the member of staff should consult with a DSL before completing any written records as reporting urgent concerns takes priority.
- e) When recording concerns, staff should record facts and information only, avoiding personal opinion.
- f) The record should use names, not initials, for all references to people.
- g) General terms such as inappropriate language/behaviour should be avoided - be as specific as possible. Describe the actual behaviour and/or state the specific language used.
- h) Staff must not investigate further or speak to parents or other staff before discussing a concern with the DSL. The DSL will determine the next course of action.

9.3 Evidence, including content on electronic devices

- a) All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be kept and preserved.
- b) If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- c) Staff should not view images, look for further images, copy or print any images or forward images by email or any other electronic means. (This is particularly important if incidents of sexting, nudes or semi-nudes are found, as to do so is illegal.)
- d) If the imagery has already been viewed by accident (e.g. if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- e) Do not delete the imagery or ask the pupil to delete it.
- f) Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- g) Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- h) Do not say or do anything to blame or shame any pupil(s) involved.
- i) Do explain that you need to report it and reassure them that they will receive support and

- help.
- j) Report the matter to the DSL immediately
 - k) Further advice can be found in UKCIS Education Group *Sharing nudes and semi-nudes: advice for education settings working with children and young people*.

10. ACTION BY THE DSL

On receipt of a concern the DSL will decide and record the action taken. Action will depend on the nature of the concern. It may include one or more of the following:

- Monitoring the pupil in school
- A discussion with parents
- Early help intervention from the school and/or 'Early Help' request from another agency
- Referral to Children's Services
- Referral to the LADO
- Report to the police

The DSL may seek advice or guidance from the Kent Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps. They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

If a child is in immediate danger or is at risk of harm, a request for support should will be made immediately to Integrated Children's Services (Front Door) and/or the police in line with Kent SCMP procedures.

11. EARLY HELP

- a) Early help means providing support as soon as a problem emerges at any point in a child's life. All school staff should be prepared to identify families and/or children who may benefit from early help as providing support at this stage is more effective in promoting the welfare of the child than reacting later.
- b) Additional support systems in school may form part of early help strategies e.g. pastoral school support, counsellor, school mentors and should feed into Local Authority early help measures as required.
- c) Evidence is kept of all early help interventions.
- d) In the first instance, staff should discuss early help requirements with the DSL. The DSL will then take the lead but staff may be required to support other agencies and professionals in an early help assessment. Chapter 1 of Working Together to Safeguard Children (2018) provides detailed guidance on the Early Help process.
- e) The DSL will keep all Early Help cases under constant review and a request for further support will be made if the situation does not appear to be improving or is getting worse.

12. REFERRAL TO CHILDREN'S SERVICES

- a) Referrals about a child must be made to the borough in which the child resides. The policy of the school requires that all referrals are made by the school's DSL; however, in exceptional circumstances and in an emergency staff may raise concerns directly with Children's Services themselves. Anyone can make a referral.
- b) When making a referral the DSL follows the thresholds laid out by Kent SCMP in their Support Levels Guidance document. Available at <https://www.kscmp.org.uk/guidance/kent-support-levels-guidance>
- c) If at any point there is a risk of immediate serious harm to a pupil, a referral should be made

- to Children's Services and/or the police immediately.
- d) If there is any room for doubt as to whether a referral should be made, the DSL will consult with Children's Services.
 - e) If the initial referral is made by telephone, the DSL will confirm the referral in writing, following local referral procedures, within 24 hours. If no response or acknowledgement is received within one working day the DSL will contact Children's Services again.
 - f) The referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation.
 - g) Children's Services will advise the school on the next course of action following local procedures on thresholds of need. This may include:
 - **Early Help** from within the school and/or external agencies (see above)
 - **Section 17** assessment (the child is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989 by a social worker)
 - **Section 47** assessment (under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. In some circumstances, there may be a need for immediate protection whilst an assessment and enquiries are carried out.

If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following KSCMP escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school or by the Local Authority. Staff can call 0800 028 0285 or email help@nspcc.org.

12.1 Multi-agency working

Fosse Bank School recognises its responsibility, to follow the multi-agency safeguarding arrangements of the Kent SCMP. The leadership team and DSL will work to establish strong and co-operative local relationships with all professionals in other agencies in line with statutory guidance.

Fosse Bank School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to local processes as required such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

13. CONFIDENTIALITY AND INFORMATION SHARING

- a) Fosse Bank School recognises its duty to share relevant information with appropriate agencies in matters relating to child protection. Information will be shared according to the HM Government guidance: Information Sharing (July

2018).

- b) This states that staff should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. *Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.*
- c) The guidance states that the information shared should be:
 - Necessary and proportionate** - Any information shared must be proportionate to the need and level of risk.
 - Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
 - Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
 - Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
 - Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
 - Secure** - Wherever possible, information should be shared in an appropriate, secure way.
 - Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.
- d) All staff must be aware that they cannot promise confidentiality to a child in any situation which might compromise a child's safety or wellbeing.
- e) The DSL or Deputy DSL will disclose information about pupils on a 'need to know' basis.
- f) Fosse Bank School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that the school is compliant with all matters relating to confidentiality and information sharing requirements. That person is Alison Cordingley, Head.
- g) The School will seek advice if there is ever any uncertainty about the sharing of information
- h) DfE Guidance on Information Sharing (July 2018) provides further detail. To be found on Sharepoint-Staff Room.

14. COMMUNICATION WITH PARENTS

- a) All parents are aware from the school's website that the school has a Child Protection Policy and is required to follow statutory guidance to safeguard its pupils.
- b) The school aims to work closely with parents to help support pupils and their families; however, it will always put the duty of care to the pupil as its priority and will refer concerns if it considers a pupil is, or may be at risk of, harm or has suffered harm.
- c) The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. The reasons for the school's concerns will be explained along with the course of action the school intends to take.

- d) Normally, the DSL will contact parents before making a referral. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Services.
- e) Referrals to Children's Services do not require prior parental consent. The DSL must act in the best interests of the pupil, even if this results in making a referral against the parents' wishes.

15. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

- a) Fosse bank School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.,
- b) The school acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. All members of staff are encouraged to explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.
- c) The DSL will work closely with the school SENDco, to plan support as required and will ensure that children with SEN and disabilities, particularly those with communication difficulties, are supported to ensure that their voice is heard and acted upon.
- d) Members of staff are made aware that children with SEN and disabilities can also be disproportionately impacted by issues such as bullying and exploitation, including online.

16. CURRICULUM

- a) Fosse Bank School ensures that children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum.
- b) The school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- c) The school curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of ageappropriate contacts and strategies to ensure their own protection and that of others.
- d) Fosse Bank School ensures that PSICHE, including Relationships, Sex and Health Education are embedded into the curriculum.
- e) The school has a strong pastoral system and promotes an ethos where pupils feel safe to share information about anything that is worrying them. School systems support children to talk to a range of staff. Children are listened to and heard, and their concerns are always be taken seriously and acted upon as appropriate. Children know they have a trusted adult of their choice to talk to and are regularly reminded of this. There are also worry boxes

monitored by the class teacher and Childline posters in school with a telephone number that pupils can contact. Pupils can also ask for 'bubble time'; a time when that member of staff will make themselves available to that child.

17. ONLINE SAFETY (Also see ICT Acceptable Use Policy, Online Safety Policy) *[DB Please alter these to suit your own titles. You do not need a great deal of info in this section as it is covered in other related policies.]*

- a) It is recognised by the school that the use of technology presents challenges and risks to children and adults both inside and outside of school. The school will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- b) The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism. ^{[[1]]}_[SEP]
 - contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'. ^{[[1]]}_[SEP]
 - conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and ^{[[1]]}_[SEP]
 - commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- c) The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.
- d) The school takes all reasonable steps to limit children's exposure to online risks through the school IT systems and will ensure that appropriate filtering and monitoring systems are in place; Redcentric is used to filter the access pupils have to the internet.
- e) The school ensures the curriculum enables all learners to learn about and manage online risks effectively and to learn about appropriate online behaviour.
- f) Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and technical staff, as appropriate.
- g) Any access to material believed to be illegal will be reported immediately to the appropriate agencies, including the police.
- h) Online safety training for all staff is integrated, aligned and considered as part of the school's overarching safeguarding approach.
- i) The DSL responds to online safety concerns in line with the Child Protection Policy and other associated policies such as Anti-bullying and Behaviour.
- j) Internal sanctions and/or support will be implemented as appropriate.
- k) Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

18. THE USE OF PREMISES BY OTHER ORGANISATIONS

Where services or activities are provided separately by another body using the school premises, the headteacher and governing body will seek written assurance that the organization concerned has appropriate policies and procedures in place with regard to safeguarding children

and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers.

If this written assurance is not received, any application to use the school's premises or facilities will be refused.

19. SECURITY

- a) All members of staff have a responsibility for maintaining an awareness of security relating to buildings and grounds and for reporting any concerns that may come to light. Staff will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- b) Appropriate checks will be undertaken in respect of visitors and volunteers coming on to the school site. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site. Visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- c) Any individual who is not known or identifiable on site will be challenged by staff for clarification and reassurance.
- d) The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

20. COMPLAINTS

- a) The school has a Complaints Procedure available to parents. This is available on request and can be found on the website.
- b) All complaints will be taken seriously and considered in accordance with the school's procedures.
- c) Any complaint that constitutes an allegation against a member of staff or volunteer cannot be dealt with under the Complaints Policy and will be dealt with under the specific procedures for Managing Allegations against Staff outlined in this policy at Paragraph 23 .

21. STAFF SUPERVISION AND SUPPORT

- a) The school recognises that staff who are involved with a pupil who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- b) Any member of staff affected by issues arising from concerns for children's welfare or safety should seek support from the DSL.
- c) The school will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff feel confident and are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff including supply staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- d) The school will ensure that members of staff who are working within the Foundation Stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- e) The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff may also wish to approach organisations such as their union, the

Education Support Partnership or other similar organisations directly.

- f) Supervision for the DSL and DDSs –Information updates are sent regularly by the Kent Safeguarding Team to DSLs with additional meetings to share information and good practice.

22. SAFER RECRUITMENT (*also see Safer Recruitment Policy*)

- a) Fosse Bank School is committed to ensuring that all steps are taken to recruit staff and volunteers who share the school's commitment to safeguarding pupils.
- b) The school follows relevant guidance in Keeping Children Safe in Education 2021 (Section 3 'Safer Recruitment'), The Disclosure and Barring Service (DBS) and Disqualification under the Childcare Act 2006 (September 2018)
- c) The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes and maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- d) The governing body ensures that there is at least one person who has completed safer recruitment training at every appointment interview.
- e) All staff are required to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- f) All staff are checked as to their suitability. These checks include
- The taking up of references
 - Verification of identity
 - Verification of right to work in the UK
 - Where appropriate, verification of qualifications
 - Where appropriate, overseas police checks
 - A satisfactory enhanced check with the Disclosure & Barring Service (DBS), including a Barred List check for staff engaged in regulated activity
 - A self declaration to ensure compliance with regulations made under the Childcare Act 2006
 - For teachers, verification of Qualified Teacher Status (QTS), and the completion of teacher induction or probation.
 - For staff engaged in teaching duties, a check that the person is not subject to a prohibition order issued by the Secretary of State.
 - Where appropriate, a check that there is no teacher prohibition order issued by any overseas professional authority
 - Where appropriate, an overseas criminal record check(s)
 - Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school
 - A medical fitness questionnaire and declaration.

23. ALLEGATIONS AGAINST STAFF

- a) As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors). All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team will always take such concerns or allegations received seriously.
- b) All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the pupils, and to reduce the risk of any allegation of improper behaviour.

- c) If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in Part 4 of KCSIE and the procedures of Kent SCMP.
- d) Allegations that might indicate that a person is unsuitable to work with children are where a person has:
 - behaved in a way that has harmed a child, or may have harmed a child and/or; [SEP]
 - possibly committed a criminal offence against or related to a child and/or; [SEP]
 - behaved towards a child or children in a way that indicates he or she may [SEP] pose a risk of
 - harm to children; and/or [SEP]
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children. [SEP]
- e) The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the school, regardless of whether the school is where the abuse is alleged to have taken place and regardless of whether it involves pupils at this school.

23.1 Reporting an allegation or concern

- a) Staff must never think that abuse by an adult is not possible in this school, or immediately disbelieve an accusation against someone who is known well and trusted.
- b) A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Head, unless the Head is the one against whom the allegation is made.
- c) An allegation against the Head should be reported to the Chair of Governors
- d) In the Head's absence, an allegation against a member of staff must be reported to the Chair of Governors.
- e) In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Chair of Governors, the LADO should be contacted directly and without hesitation.
- f) Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

23.2 Procedures & Informing the Local Authority Designated Officer (LADO)

- a) If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police will be made immediately. [SEP]
- b) An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Kent SCMP who will advise on the next steps to be taken.
- c) Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases will also

be discussed and, following discussions, the LADO will advise what further steps should be taken.

- d) There are two aspects to consider when an allegation is made:-
- Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Services as described earlier.
 - Investigate and support the person subject to the allegation - the case manager (usually the head, unless the head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- e) The school's aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.
- f) The Head will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.
- g) The Head will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- h) Any allegation against staff, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.
- i) An initial assessment of any allegation referred will be made by the LADO and the Head. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary procedures.
- j) Where the initial discussion leads to no further action, the case manager and the LADO will:
- record the decision and justification for it; and
 - agree on what information should be put in writing to the individual concerned and by whom.
- k) Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Head. If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.
- l) In the case of a referral and investigation, the Head must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.
- m) Where there are no objections from the investigating agencies, the Head will:
- inform the person making the allegation and explain the likely course of action
 - ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
 - inform the member of staff against whom the allegation is made and explain the likely course of action
 - keep a written record of the above.
- n) The Head, in consultation with the LADO, will make the decision whether or not to suspend the teacher involved.

- o) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Education Act (2011) prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation by a pupil. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.
- p) The Head will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
- Who needs to know and exactly what information can/cannot be shared
 - How to manage speculation and gossip^[SEP]
 - What, if any, information can be given to the wider community to reduce speculation
 - If necessary, how to manage the press.
- q) The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- r) The following definitions will be used when determining the outcome of allegation investigations:
- Substantiated: there is sufficient evidence to prove the allegation;
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive; ^[SEP]
 - 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. ^[SEP]
- s) Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- t) Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

23.3 Allegations relating to supply teachers/employees of third party

- a) The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business. The school will usually take the lead but agencies/ third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.
- b) In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The school will discuss with the agency whether it is appropriate to suspend the supply teacher while an investigation is carried out but this decision rests with the Head and the LADO.

23.4 Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

- a) If the school ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.
- b) For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.
- c) A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in [Teacher misconduct: the prohibition of teachers](#) (October 2015). Further guidance is published on the [TRA website](#).

24. LOW LEVEL CONCERNS

- a) 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, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- b) A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted.
- c) 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/other device
 - engaging with a child on a 1:1 basis in a secluded area or behind a closed door
 - using inappropriate sexualised, intimidating or offensive language,
 - Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols
 - Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation;
- d) Staff must report any low level concerns whatsoever to the Head or Chairman of Governors following the procedures as outlined above in Paragraph 26.1.
- e) Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- f) When a low-level concern has been raised by a third party, the head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

- g) The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies may be revised or extra training delivered to minimise the risk of recurrence.
- h) All low-level concerns will be recorded in writing. The record will include:
- details of the concern;
 - the context in which it arose;
 - evidence collected by the Head where the concern has been raised via a third party;
 - the decision categorising the type of behaviour;
 - action taken;
 - the rationale for decisions and action taken;
 - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- i) Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- j) Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
- k) The purpose of low level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- l) Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- m) A staff member who reports a Low Level concern, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the school's Whistleblowing Policy.

25. NON-RECENT ALLEGATIONS

- a) Abuse can be reported no matter how long ago it happened.
- b) Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.
- c) Non recent allegations made by a child, will be reported to the LADO in line with Kent SCMP procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

26. LEGISLATION AND GUIDANCE

This policy pays due regard to the following statutory guidance and other government advice. It also complies with other legal requirements and guidance and follows advice from Kent SCMP.

1. [DfE statutory guidance 'Keeping Children Safe in Education \(KCSIE\) \(September 2021\)](#)
2. [Working Together to Safeguard Children \(WT\) \(2018 updated 2020\)](#)
3. [HM Gov advice 'What to do if you're worried a child is being abused' \(March 2015\)](#)

4. [Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' \(April 2020\)](#)
5. [DfE guidance 'Teaching online safety in school' \(June 2019\)](#)
6. [London Child Protection Procedures \(6th edition 2020 amended March 2021\)](#)
7. [Mental health and behaviour in schools: departmental advice \(November 2018\)](#)
8. [When to call the police, non-statutory guidance from the National Police Chiefs' Council](#)

9. [DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#)
10. [DfE advice 'Sexual violence and sexual harassment between children in schools and colleges' \(updated 2021\) summarised in Part 5 of KCSIE](#)
11. [DfE Statutory Guidance "Relationships Education, Relationships and Sex Education \(RSE\) and Health Education"](#)
12. [DfE Searching Screening and Confiscation Advice for schools and the UKCIS Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
13. [Designated teacher for looked after children \(February 2018\)](#)
14. The specific legal requirements in the "Safeguarding" section of Safeguarding and promoting children's welfare, Part 3 of the Statutory Framework for the Early Years Foundation Stage (2021)
15. DfE statutory guidance 'Children missing education' (September 2016)
16. [Disqualification under the Childcare Act 2006](#) (September 2018)
17. Counselling in schools: a blueprint for the future (February 2016)
18. [DfE's Searching Screening and Confiscation Advice](#)
19. [UKCIS Education Group's Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

20. [Prevent Duty Guidance for England and Wales \(originally issued March 2015 revised July 2015\) \("Prevent"\)](#)

21. Prevent is supplemented by non-statutory advice: The Prevent duty: [Departmental advice for schools and childcare providers \(June 2015\)](#) and

22. a briefing note for schools about the use of social media for on-line radicalisation (July 2015) [The use of social media for on-line radicalisation](#)

23. [Teacher misconduct: the prohibition of teachers \(October 2015\)](#)

24. [DfE statutory guidance 'Disqualification under the Childcare Act 2006' \(February 2015\)](#)

27. POLICY MONITORING AND REVIEW

Fosse Bank School reviews this policy at least annually and it is also updated whenever needed so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learned. As a result, the policy is also revised following any national or local policy updates. , any local child protection concerns and/or any changes to our procedures.

The DSL ensures a termly report is sent to the Safeguarding Governor and an annual Safeguarding Audit is presented to the Governing Board.

[DB I have added this sentence as there needs to be a comprehensive audit of safeguarding by the governors as itemised in the section on their responsibilities.]

The DSL ensures regular reports on safeguarding are presented to the governing body, ensuring that the governing body does not receive confidential details of individual situations or any identifying features of families as part of their oversight responsibility. The DSL also provides an annual report to the governing body detailing safeguarding training undertaken by all staff and maintains an up to date register of who has been trained and the training received.

Policy Reviewed January 2022
Next routine review June 2022

APPENDIX 1

FORMS AND SIGNS OF ABUSE AND SAFEGUARDING ISSUES

1. Abuse

Abuse: *a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. (KSCIE, 2021)*

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators so

that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the DSL (or deputy).

All school staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Any concern whatsoever must be reported to the DSL. In many cases it is not one major incident which triggers a referral but a series of seemingly more minor events. It is therefore important that these events are recorded and reported to the DSL immediately.

Factors which may make a child particularly vulnerable to abuse include:

- living in a home where there is domestic abuse;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
- affected by (a) parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language;
- 'Looked After' Children (LACs) or children in care or who have returned home to their family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.
- [Children with special educational needs and disabilities or physical health issues](#)

1.2 Definitions of abuse

There are four types of child abuse. They are defined in KCSIE (2021) as follows:

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

1.3 Physical abuse

A form of abuse which 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.

Indicators of physical abuse

- Any injuries not consistent with the explanation given for them.
- Injuries which occur to the body in places which are not normally exposed to falls or rough games.
- Injuries which have not received medical attention.
- Reluctance to change for, or participate in, games or swimming.
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation.
- The child gives inconsistent accounts for the cause of injuries.
- Frozen watchfulness.

1.4 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may

feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators of emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy.
- Obsessions or phobias.
- Sudden underachievement or lack of concentration.
- Seeking adult attention and not mixing well with other children.
- Sleep or speech disorders.
- Negative statements about self.
- Highly aggressive or cruel to others.
- Extreme shyness or passivity.
- Running away, stealing and lying.

1.6 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.

Indicators of sexual abuse

- Any allegations made by a child concerning sexual abuse.
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age.
- Sexual activity through words, play or drawing.
- Repeated urinary infections or unexplained stomach pains.
- The child is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations.
- Eating disorders such as anorexia or bulimia.

1.7 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry

- Overeating junk food

1.8 Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be more difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing, particularly in the teenage years. This can lead to increased risks with children who may have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

2. Further safeguarding issues

Safeguarding issues of which staff should be aware are listed below.

Further detailed information can also be found in KCSIE, Annex B.

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- child abduction and community safety incidents
- children missing from education (*also see attendance policy*)
- children and the court system
- child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)
- cybercrime
- children with family members in prison
- domestic abuse
- fabricated or induced illness
- homelessness - *see Annex B*
- so-called 'honour based' abuse, including female genital mutilation (FGM) and forced marriage –
- mental health
- modern slavery and the National Referral Mechanism - *see Annex B*
- peer on peer abuse
- private fostering
- preventing radicalisation, including additional support
- sexting (Nudes/semi-nudes) (*see section on peer on peer abuse below*)
- sexual violence and sexual harassment (*see section on peer on peer abuse below*)
- teenage relationship abuse (*see section on peer on peer abuse below*)
- upskirting (*see section on sexual harassment below*)

2.1 Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

The curriculum focuses on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

2.2 Children missing from education

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. The school ensures that the Local Authority is informed of any unexplained absence immediately for pupils with involvement from Children's Services and

reports to the local authority any pupil who fails to attend school regularly or has been absent, without the school's permission for a continuous period of 10 school days.

The Local Authority is also informed about any child whose name is added to or deleted from the admission register at a non-standard transition point.

2.3 Children and the court system [SEP]

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. Making child arrangements via the family courts following separation and divorce can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

2.4 Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE) (including gangs & county lines)

CSE and CCE 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. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CSE is a form of child sexual abuse and can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when the sexual activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim e.g. they believe they are in a genuine romantic relationship. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- **Inappropriate relationships:**
Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- **Boyfriend:**
Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- **Organised exploitation and trafficking:**
Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

2.5 Child Criminal Exploitation (CSE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. 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 several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be made.

Staff should be aware of the key indicators of children being sexually or criminally 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;
- displaying inappropriate sexualised behaviour.

2.6 Cybercrime (also see Online Safety Policy)

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 child in this area, the DSL (or a deputy), will consider a referral into the [Cyber Choices](#) programme.

This programme 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.

Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

2.7 Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

2.8 Domestic Abuse

This is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and long lasting emotional and psychological damage. Staff must be alert to the signs and symptoms of a child suffering or witnessing domestic abuse. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

2.9 Operation Encompass

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 usually 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 support to be given to the child according to their needs.

2.10 Fabricated Illness

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history;
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid
- Induction of illness by a variety of means

Further information may be found at https://www.londoncp.co.uk/fab_ind_ill.html

2.11 Honour-based Abuse and Female Genital Mutilation

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Such abuse can also occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

2.12 Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society;
- mother or a sister who has undergone FGM;
- girls who are withdrawn from PSHE and/or RSE;
- visiting female elder from the country of origin;
- being taken on a long holiday to the country of origin;
- talk about a 'special' procedure to become a woman.

2.13 Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should school staff physically examine pupils.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101. The report should be made immediately. The duty to report should not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999.

2.14 Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage.

3. Peer on Peer Abuse (also see Behaviour Policy and Anti-bullying Policy)

The school is alert to the fact that peer-on-peer abuse, involving the physical, sexual and/or emotional abuse of young people, of any age, by one or more of their peers, of either sex, is a potential safeguarding issue. All staff are aware that children can abuse other children, and that it can happen both inside and outside of school and online. Online abuse can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

The School has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". It will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm. All children involved whether victim or perpetrator will be treated as "at risk" and supported.

The school recognises the gendered nature of peer on peer abuse and that it is more likely that girls will be victims and boy's perpetrators; however, all peer on peer abuse is unacceptable and must be taken seriously. Staff will always challenge any inappropriate language or behaviour and are aware of developing positive attitudes within pupils, including towards the opposite sex and of promoting and displaying an ethos of mutual respect and equality.

All staff understand, that even if there are no reports in the school it does not mean peer on peer abuse is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding peer on peer abuse they must speak to the DSL or deputy DSL immediately.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment (see below and also see Part five KCSIE and DfE guidance *Sexual violence and sexual harassment between children in schools and colleges*)
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) Also see DfE *Searching Screening and Confiscation Advice* for schools and the UKCIS Education Group *Sharing nudes and semi-nudes: advice for education settings working with children and young people* which outlines how to respond to an incident of nudes and semi-nudes being shared
- 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 (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission
- initiation/hazing type violence and rituals. ^[SEP]
- prejudiced behaviour - behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, connected with prejudice around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity.

Any child can be vulnerable to peer-on-peer abuse and staff should be alert to signs of such abuse amongst all children. However, individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers as may children with SEND or certain medical conditions. ^[SEP]

Staff receive safeguarding training and anti-bullying training so they are aware of the harm caused by peer on peer abuse and follow the school's Behaviour Policy, Anti-bullying Policy and Safeguarding procedures as appropriate.

If a child or young person causes harm to another, this will not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. As with other safeguarding decisions,

the threshold for dealing with an issue of pupil behaviour or bullying as a safeguarding matter is subject to local guidance and professional judgement. However, it may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned;
- the perpetrator has repeatedly tried to harm one or more other children;
- there are concerns about the intention of the alleged perpetrator;
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'

A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the usual safeguarding reporting procedures contained in Paragraph 15 of this policy.

3.1 Sexual violence and sexual harassment by pupils

The School has a zero-tolerance approach to any form of sexual violence and sexual harassment; it is never acceptable and will not be tolerated.

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers. It can also occur online.

Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and that it is more likely to be perpetrated by boys. However, all reports must be treated seriously.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

Staff should follow the usual safeguarding processes outlined in Paragraph 9 of this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online. They should also follow the advice in Paragraph 9.3 regarding dealing with reports which involve images and/or the sharing of images.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

Staff also should bear the following in mind in relation to sexual violence and harassment:

- Children may not find it easy to tell staff about their abuse verbally
- How they respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward
- That it's essential to reassure all victims that they're being taken seriously, regardless of how long it has taken them to come forward and that they'll be supported and kept safe
- The importance of taking a zero-tolerance approach
- The importance of recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, and so children may not be able to recall all the details or the timeline of the abuse
- That abuse occurring online should not be downplayed and should be treated seriously
- That certain children may face additional barriers in telling someone because of their disability, sex, ethnicity and/or sexual orientation

When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE. This will include

- Initial response - considering the needs of both victim(s) and alleged perpetrator(s). ^[1]_[SEP]
- Record Keeping ^[1]_[SEP]
- Risk Assessment ^[1]_[SEP]
- Consideration of most appropriate response: internal management, early help, referral to Children's Services and/or referral to the Police. ^[1]_[SEP]
- Ongoing response – safeguarding and support for all parties ^[1]_[SEP]

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police. The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

3.2 Support and Sanctions

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Any support or sanctions required following a report of peer on peer abuse will be determined on a case by case basis.

Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case by case basis depending on the circumstances.

3.3 Sexting (youth produced sexual imagery, nudes/semi-nudes)

Sexting is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. The school uses the Computing, PSHCE and RSE curriculum to help pupils to understand and avoid the risks associated with 'online activity'.

Sexting (youth-produced sexual imagery) includes the sending of sexually explicit photos, images, text messages, or e-mails by using a phone or other mobile device.

By having in their possession indecent images of a person under 18, or distributing them to someone else, children are unlikely to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. There are many different types of sexting and it is important to consider the facts carefully in each case. Therefore, it is important that the DSL or Deputy DSL is informed immediately of any sexting (youth-produced sexual imagery) incidents. Staff should follow the guidelines in paragraph 15.3 above if images are discovered.

3.4 Preventative Strategies to minimise the risk of Peer on Peer abuse

Staff are made aware of peer on peer abuse, and how to identify it, through annual refresher training, and pastoral systems allow for careful monitoring of relationships in the school.

Preventative strategies for peer on peer abuse are also regularly considered by the school. The school also ensures that pupils feel safe to confide and share information about anything that is distressing them and any inappropriate language or behaviour is always challenged by staff.

The PSHCE, IT and RSE curriculum along with the pastoral care system gives pupils the opportunity to talk about disputes or difficulties. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including the vulnerability of those who inflict such abuse.

Pupils are made aware that there are a variety of ways in which they can express their views and feelings on any pastoral matter; to access support in order to prevent abuse from occurring, to report abuse that is happening, and to find ongoing support after abuse has been identified. (See paragraph 10)

4. Sexual behaviour by pupils

The boundary between what is part of normal childhood experimentation or abusive behaviour can be blurred. However, 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. The decision about whether behaviour is developmental, inappropriate or abusive will be determined by the concepts of consent, power imbalance and exploitation.

Developmental sexual activity occurs in children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. It is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. Abusive sexual activity includes any behaviour which involves coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach:

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability;
- reflective of natural curiosity, experimentation, consensual activities and positive choices.

Amber behaviours have the potential to be outside safe and healthy development. They may be:

- unusual for that particular child or young person;
- of potential concern due to age or developmental differences;
- of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour.

They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening;
- involving significant age, developmental or power differences;
- of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for a referral to Children's Services

More information may be found on this tool on: <https://www.enhertscqg.nhs.uk/sites/default/files/Sexual-Behaviours-Traffic-Light-Tool.pdf>

A child displaying inappropriate sexual behaviour may be an indication that they are a victim of abuse themselves. 

5. Children requiring mental health support

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. All staff are made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision

Mental health concerns that are too complex or serious to be dealt with in school using our normal interventions may, with the consent of parents, be referred to the school's counsellor. Early Help may also be suggested to parents.

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)

- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behavior
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem. School staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Concerns should be raised in pastoral/staff meetings or in person or by e-mail to senior staff.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following the child protection policy and speaking to the designated safeguarding lead or a deputy.

More information can be found in the DfE schools guidance which can be accessed via the following link: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> .

6. Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support extremist ideologies associated with terrorism.

Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It would also include calls for the death of members of our armed forces whether in this country or overseas.

Schools have a duty to ‘prevent people being drawn into terrorism’ known as the ‘Prevent Duty’. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school’s overall safeguarding approach. The curriculum is used to ensure pupils understand how people with extreme views share their beliefs with others, especially through the internet. The school also actively promotes the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Where staff are concerned that pupils are developing extremist views, they should discuss this with the DSL.

6.1 Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the

Channel panel to help with this assessment.

7. Visiting Speakers

Any visiting speakers will be suitably vetted. Visiting speakers will be expected to understand that, where applicable, they should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no time should these be undermined.

8. Private Fostering

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

Appendix 2: National Support Organisations

The following links may help DSLs provide further advice and support to their learners, staff and parents/carers. Additional links can be found in KCSIE 2021

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk

- **Women's Aid:** www.womensaid.org.uk
- **Men's Advice Line:** www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Contextual Safeguarding, Peer on Peer abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>

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- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk