

Safeguarding and Child Protection Policy

This policy applies to all pupils and staff of Abbot's Hill School including EYFS.

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School Contacts

<p>For all safeguarding and child protection concerns, please call 01442 240333 option 8 to speak to the Main Reception and ask to speak to a Designated Safeguarding Lead.</p>	
<p>Designated Safeguarding Lead (including EYFS) Miss Elizabeth Impett, Deputy Head Pastoral</p>	<p>Email: eimpett@abbotshill.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Head of Prep, Miss Katherine Bluck</p>	<p>Email: kbluck@abbotshill.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Assistant Head of Prep, Mrs Victoria Lopez Bernal</p>	<p>Email: vlopezbernal@abbotshill.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Mrs Jo Wallace</p>	<p>Email: jwallace@abbotshill.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Miss Lois Kemp-Robertson</p>	<p>Email: lkemp-Robertson.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Mrs Sarah Lanchbery, Nursery Manager</p>	<p>Email: slanchbery@abbotshill.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Ms Ashlea Webb , Deputy Nursery Manager</p>	<p>Email: awebb@abbotshill.herts.sch.uk</p>
<p>Deputy Designated Safeguarding Lead, Miss Claire Bradley, Senior School SENDCo</p>	<p>Email: cbradley@abbotshill.herts.sch.uk</p>
<p>Head: Mrs Kathryn Gorman</p>	<p>Email: kgorman@abbotshill.herts.sch.uk</p>
<p>Chair of Governors: Mrs Janet Mark</p>	<p>Email: pabursar@abbotshill.herts.sch.uk</p>
<p>Nominated Safeguarding Governor: Mrs Christine Edmundson</p>	<p>Email: pabursar@abbotshill.herts.sch.uk</p>

For local safeguarding children partnership details please see Section 8.

1 Policy statement

1.1 The school's policy has regard to statutory guidance:

[KCSIE 2022](#)

[Working Together to Safeguard Children 2018 \(updated February 2019\)](#) ;

[What to do if you're worried a child is being abused March 2015](#) ;

[Disqualification Under the Childcare Act 2006 \(updated 31 August 2018\)](#)

[Relationships Education, Relationships and Sex Education and Health Education guidance](#) , and:

- 1.1.1 has been authorised by the Board of Governors of the school;
- 1.1.2 is published on the school website and available in hard copy to parents on request;
- 1.1.3 can be made available in large print or other accessible format if required;
- 1.1.4 its procedures apply wherever staff, Governors or volunteers are working with pupils even where this is away from the school, for example an educational visit;
- 1.1.5 applies to the Early Years Foundation Stage (EYFS) provision;
- 1.1.6 is updated annually.

1.2 Every member of the school community should feel safe and protected from any form of abuse. The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The school will take all reasonable measures to:

- 1.2.1 ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people in accordance with: the guidance given in:

Keeping Children Safe in Education 2022;

- Disqualification under the Childcare Act 2006 (updated August 2018) ;
- Independent School Standards (April 2019);
- Statutory Framework for the Early Years Foundation Stage (2021)
- Human Rights Act 1998;
- Equality Act 2010;
- Public Sector Equality Duty (see also KCSIE 2022 paragraphs 82-93)
- See also the school's separate **Safer Recruitment and Selection Policy**;

- 1.2.2 ensure that where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff;
The school must check that external activity providers have appropriate safety standards and liability insurance. The Council for Learning Outside the Classroom (LOtC) awards the LOtC Quality Badge to organisations which meet nationally recognised standards. Where the organisation does not hold the badge, the school must check they are an appropriate organisation to use. This will include checking:

- their insurance
- they meet legal requirements
- their health and safety and emergency policies
- their risk assessments and control measures
- their use of vehicles
- staff competence
- safeguarding training
- accommodation
- any sub-contracting arrangements they have
- that they have a licence where needed. Pupils will not be left unsupervised if these measures are not in place.

- 1.2.3 follow the local inter-agency procedures of the Hertfordshire Safeguarding Children Partnership; <https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/hscp.aspx>

- 1.2.4 be alert to signs of abuse both in the school and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- 1.2.5 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;
- 1.2.6 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- 1.2.7 be alert to the needs of pupils with SEND or certain health conditions, who can face additional safeguarding challenges. These pupils may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying. These can include:
 - i. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;
 - ii. the potential for pupils with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs; and
 - iii. communication barriers and difficulties in managing or reporting these challenges.
- 1.2.8 Make all staff aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability and/or sexual orientation/or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Safeguarding Team if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children which facilitate communication;
- 1.2.9 Make all staff aware that It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them;
- 1.2.10 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- 1.2.11 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- 1.2.12 identify children who may be vulnerable to radicalisation, and know what to do when they are identified;

- 1.2.13 teach pupils about safeguarding (including Online Safety), for example through the use of online resources, through the curriculum and PDE, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help.

The School recognises that, although mobile phones are not permitted to be used on the school site during the school day except under specific supervised circumstances, outside school and after the end of the school day, older pupils with mobile phones have unlimited and unrestricted access to the internet which means that pupils may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's Online Safety Policy, which also includes detail on the School's IT arrangements to ensure that pupils are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet¹⁸² through the School's systems.

Pupils in Key Stage 3 and 4 complete the OSA Certificate of Online Safety at the start of the Key Stage. <https://onlinesafetyalliance.org/osa-certificate/>

- 1.2.14 take all practicable steps to ensure that school premises are as secure as circumstances permit;
- 1.2.15 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the school or in the local area; and
- 1.2.16 have regard to regulations and standards issued by the Secretary of State for Education (DfE) in accordance with section 94 of the Education and Skills Act 2008 and sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and associated regulations.

- 1.3 Keeping Children Safe in Education 2022 defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

- 1.4 The Prevent Duty Guidance for England and Wales emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

1.5 Keeping Children Safe in Education 2022 provides that the inspection of independent schools will ensure that the Independent School Standards which concern the welfare, health and safety of children are met.

1.6 Related policies

1.6.1 The following policies and procedures are also relevant to the school's safeguarding practices:

- (a) **Staff Code of Conduct and Safe Working Practice Policy***
- (b) **Promoting Positive Behaviour Policy**
- (c) **Whistleblowing Policy***
- (d) **Safer Recruitment and Selection Policy**
- (e) **Anti-bullying Policy**
- (f) **Online Safety Policy***
- (g) **Missing Child Policy**
- (h) **Policy on supporting pupils at school with medical conditions**
- (i) **Self-Harming Policy and Procedure**
- (j) **Prevent Strategy Review and Further Implementation Plan**

These policies are available on the school website, in the school Policies folder on the school's intranet and hard copies are available on request.

* A hard copy is provided in the Induction Folder alongside other relevant policies. Links to other policies on the school's intranet are provided by email.

2 The Designated Safeguarding Lead

2.1 The school's Board of Governors has appointed a member of staff of the school's Senior Leadership Team with the necessary status and authority (Designated Safeguarding Lead) to be responsible for matters relating to safeguarding, child protection, online safety and welfare.

2.2 The Designated Safeguarding Lead for the school, including EYFS, is Miss E Impett, Deputy Head, Pastoral. The Designated Safeguarding Lead is a member of the Executive Team.

2.3 The Deputy Designated Safeguarding Leads are listed under School Contacts at the start of this policy.

2.4 The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.

2.5 The Designated Safeguarding Lead will be provided with appropriate supervision support where possible.

2.6 In accordance with **Annex C of Keeping Children Safe in Education 2022**, the main responsibilities of the Designated Safeguarding Lead (deputies are trained to the same standard as the Designated Safeguarding lead) are to:

2.6.1 Manage referrals

The Designated Safeguarding Lead (and any deputies) is expected to:

- refer cases of suspected abuse to the local authority Children's Services as required;
- support staff who make referrals to local authority Children's Services;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required;
- manage any support for the child internally via the school's own pastoral support processes, an early help assessment; or a referral for statutory services for example as the child might be in need, is in need or suffering or likely to suffer harm.

2.6.2 Work with others

The Designated Safeguarding Lead (and any deputies) is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the Head to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four of KCSIE 2022) and the designated officer(s) (LADO) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral staff, school nurse, mental health leads, IT technology department, and SENDCO) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health;
- Promote supportive engagement with parents and or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
 - ensuring that the school or college knows the children in its in its cohort who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes

2.6.3 Training

The Designated Safeguarding Lead (and any deputies) undergoes training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The Designated Safeguarding lead has made links with the local safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies. The DSL and Deputy Designated Safeguarding Leads have completed annual training that provides them with the knowledge and skills required, they receive updated training every two years and have completed training on the Prevent Strategy and Online Safety. The Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals.

DSL training undertaken by Abbot's Hill DSL and DDSLs

Name	Date	Course & Provider
Miss Lois Kemp-Robertson	January 2022	2-day DSL - Hertfordshire
Mrs Jo Wallace	January 2022	2-day DSL - Hertfordshire

The Designated Safeguarding Lead has undertaken Prevent awareness training. All training will be carried out in accordance with Hertfordshire Safeguarding Children Partnership's procedures. Prevent duty training will be consistent with Home Office WRAP (Workshop to Raise Awareness of Prevent) training if available.

In addition to the formal training set out above, their knowledge and skills will be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's service referral arrangements. (see Working Together to Safeguard Children)
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- ensure each member of staff has access to, and understands, the school's **Safeguarding and Child Protection Policy** and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and disabilities, those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

2.6.4 Raise Awareness

The Designated Safeguarding Lead (and any deputies) should:

- ensure each member of staff and members of the Board of Governors has access to, and understands the **Safeguarding and Child Protection Policy** especially new and part time teachers;
- ensure the **Safeguarding and Child Protection Policy** is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board of Governors regarding this;
- ensure the **Safeguarding and Child Protection Policy** is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school;
- link with the Hertfordshire Safeguarding Children Partnership to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

2.6.5 Child protection files

2.6.5.1 The Designated Safeguarding Lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The Designated Safeguarding Lead should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.

2.6.5.2 The Designated Safeguarding Lead understands the importance of information sharing with other schools/colleges on transfer and ensures information in child protection files is kept confidential and stored securely.

2.6.5.3 Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

2.6.5.4 In addition to the child protection file, the Designated Safeguarding Lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and have been victims of abuse and have that support in place for when the child arrives.

2.6.6 Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

2.6.7 Understand the views of children.

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication;

2.6.8 Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR);
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

2.6.9 Availability

2.6.9.1 During term time the Designated Safeguarding Lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. A safeguarding emergency number is provided for staff to contact the Designated Safeguarding Lead out of normal school hours and holidays.

2.6.9.2 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the school. The DSL or a Deputy DSL is always available during school hours to discuss safeguarding concerns. There are arrangements in place for out of hours via email. There are arrangements in place for out of hours via email. If preferred, parents may discuss concerns in private with the pupil's class teacher/form tutor, child's form teacher or the Head who will notify the Designated Safeguarding Lead in accordance with these procedures. In exceptional circumstances, where the DSL or Deputy is not able to be on site, they will be available via Zoom or Teams Conference Calls.

2.6.9.3 If the Designated Safeguarding Lead is unavailable their duties will be carried out by one of the Deputy Designated Safeguarding Leads. The Deputy Designated Safeguarding Leads' details are also set out in the school contacts list at the front of this Policy. In this Policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Leads where the Designated Safeguarding Lead is unavailable.

2.6.9.4 For situations where the Designated Safeguarding Lead or deputies are not available the Deputy Head's PA will co-ordinate safeguarding remotely and liaise with the DSL or a Deputy. The Deputy Head's PA is able to access child protection files and update them accordingly and liaise with children's social workers.

3 Duty of staff, Governors and volunteers

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that at all times consideration should be made to what is in the best interests of the child.

Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of
- safe and effective care; and
- taking action to enable all children to have the best outcomes
- Children includes everyone under the age of 18.

3.1 All staff (including supply staff), Governors and volunteers of the school are under a general legal duty:

- 3.1.1 to protect children from abuse;
- 3.1.2 to be aware of the terms and procedures in this Policy and to follow them;
- 3.1.3 to know how to access and implement the procedures in this Policy, independently if necessary; (following the referral process in section 4)
- 3.1.4 to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an early help assessment.
- 3.1.5 to be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989. Especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments);
- 3.1.6 to provide a safe environment in which children can learn;
- 3.1.7 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy;
- 3.1.8 to report immediately any matters of concern about a child's welfare to the DSL or deputy, in accordance with this Policy;
- 3.1.9 to know what to do if a child tells them he/she is being abused or neglected. All staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child, and
- 3.1.10 for teachers to safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. (Teachers' Standard 2012)

3.2 Staff connected to the school's Early Years and Later Years provisions are under an ongoing duty to inform the school if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the school's **Safer Recruitment Policy** for further information about this duty. Staff must immediately inform the Head of any circumstances that may impact on their suitability to work with children, including but not limited to any arrests, convictions, charges or cautions for criminal offences. Staff may be required to complete a self-declaration form to ensure that the information held in this regard is up to date. A failure to disclose such information in accordance with this clause or complete the self- declaration form may be treated as a disciplinary matter and could lead to dismissal.

3.3 The Board of Governors ensures that the school's safeguarding arrangements take into account the procedures and practice of the Hertfordshire Safeguarding Children Partnership. The Board of Governors has nominated one of its members to take leadership of the school's safeguarding arrangements on behalf of the Board and to liaise with external agencies where this is required, including in the event of allegations of abuse made against the Head or a member of the Board of Governors. The Nominated Safeguarding Governor is Christine Edmundson. The Safeguarding Governor has knowledge, skills and expertise needed to fulfil this role.

3.4 Training

3.4.1 Induction

All staff, including temporary staff and volunteers, will be provided with induction training that includes:

- (i) this Policy*;
- (ii) the Promoting Positive **Behaviour Policy**;
- (iii) the **Staff Code of Conduct and Safe Working Practice Policy** * including the **Whistleblowing Policy***;
- (iv) the role of the Designated Safeguarding Lead and his / her identity and contact details together with that of his / her Deputies; *
- (v) child protection training in accordance with Hertfordshire Safeguarding Children Partnership procedures;
- (vi) a copy of Part 1 of Keeping Children Safe in Education 2022 (if they are regularly working with children) or the condensed version of Part 1 (if they don't work regularly with children.) They will be required to confirm they have read and understood these sections and any other relevant sections of KCSIE that are required as part of their role; (see **Appendix 9**)
- (vii) the online general awareness training module on Channel or WRAP Prevent Training;
- (viii) safeguarding briefing that identifies the DSL and deputies, location and methods of recording information and concerns;
- (ix) training on how to manage a report of child-on-child sexual violence and sexual harassment;
- (x) awareness of the Safeguarding response to children that go missing from education;
- (xi) **Online Safety and Acceptable Use Agreement**.*
- (xii) **Low Level Concerns** (See **Appendix 7**)

*Hard copy provided in Induction Folder alongside other relevant policies. Links to other policies on the school's intranet are provided by email or access to Educare modules to support training.

3.4.2 Child protection training

a) All Staff will have annual training that covers:

- The current version of Keeping Children Safe in Education 2022, including confirmation that they have read and understood the relevant sections of the documents in relation to their role as defined in **Appendix 9**.
- All staff should be trained to manage a report of child-on-child abuse (see Appendix 2). Effective safeguarding practice includes:
 - i. if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)
 - ii. careful management and handling of reports that include an online element.
 - iii. Being aware of searching, screening and confiscation advice.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf
- The early help process, staff members' role in it and the importance of sharing information with other practitioners
- The process for making referrals to children's social care
- The process for statutory assessments and the role staff may play in these
- What to do if they are concerned about a child including:
 - i. Not waiting until a child makes a disclosure
 - ii. Asking the child if they have been harmed and the nature of the harm
 - iii. Being aware of the barriers to making a disclosure a child may face
- What to do if a child tells a staff member they are being abused or neglected, including how to:
 - i. Maintain an appropriate level of confidentiality
 - ii. Involve only those who need to be involved (e.g. the DSL, children's social care)
 - iii. Reassure victims they're being taken seriously, supported and kept safe
 - iv. Avoid making the victim feel ashamed or like they're causing a problem
 - v. Being aware that the disclosure may only be the first incident reported rather than a single incident
 - vi. Being aware that trauma can impact memory, so children may not be able to recall all details or timeline of abuse
 - vii. Are aware that they can confiscate devices if necessary for evidence but these should be passed to the DSL and not examined by the member of staff.
- The indicators of abuse and neglect, including for specific safeguarding issues, such as child criminal and sexual exploitation
- Expectations around child-on-child abuse, including:
 - i. Maintaining an attitude of "it could happen here"
 - ii. The indicators of different types of child-on-child abuse, and how to identify incidents
 - iii. Understanding that child-on-child abuse may be taking place, even if it's not reported
 - iv. How to manage a report of child-on-child sexual violence or harassment
 - v. The importance of challenging inappropriate behaviour between peers
 - vi. Understanding that child-on-child abuse can happen inside and outside of school, and online
 - vii. Understanding how victims, perpetrators and other child affected by child-on-child abuse will be supported
- Behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one
- Online safety, highlighting that technology is a significant component in many safeguarding and wellbeing issues
- Prevent updates, including training regarding radicalisation and how to support pupils who may be at risk

- Specific safeguarding issues, serious violence, child sexual exploitation and children missing education
 - The reporting requirements for known cases of female genital mutilation (FGM)
 - The risk factors that increase the likelihood of involvement in serious violence
 - How safeguarding issues may overlap with one another
 - The importance of considering the wider context within which safeguarding incidents and behaviours occur
- b) Any subsequent updates to the Policy or Keeping Children Safe in Education will be issued to all staff and confirmation is required that they have read and understood these documents. The Head and all staff members will undertake appropriate child protection training every 3 years in consultation with the Hertfordshire Safeguarding Children Partnership. Training will include guidance on the duties of staff in relation to both children in need and children at risk of harm. In addition all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- c) Staff development training will also include training on online safety and, where they have not been able to access other Prevent training assessed as appropriate for them by the school, the online general awareness training module on Channel.
- d) All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Staff should, in particular be alert to the potential need for early intervention for a child who:
- i. Is disabled and has specific additional needs
 - ii. Has special educational needs (whether or not they have a statutory Education, Health and Care Plan) recognising that children with SEND can be more prone to peer group isolation than other children and consider extra pastoral support for those children
 - iii. Is a young carer
 - iv. Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - v. Is frequently missing/goes missing from care or home
 - vi. Is at risk of modern slavery, trafficking or exploitation
 - vii. Is at risk of being radicalised or exploited
 - viii. Is in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - ix. Is misusing drugs or alcohol
 - x. Has returned home to their family from care
 - xi. Is a privately fostered child
 - xii. Is experiencing poor mental health
 - xiii. If staff have a concern, they should follow the procedures laid out in this policy and speak to the DSL or deputy at the earliest opportunity. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. It should be clear this is everyone's responsibility.
- e) All staff should be aware that safeguarding incidents and /or behaviours can be associated with factors outside the school and/or can occur between children outside of this environment. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different form and children can be vulnerable

to multiple harms including (but not limited to) child-on-child sexual violence and sexual harassment, sexual exploitation, criminal exploitation and serious youth violence.

- f) The school will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health.
- g) The Nominated Safeguarding Governor and the Chair of Governors will receive appropriate training to enable them to fulfil their safeguarding responsibilities.
- h) All members of the Governing Board receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. The training is regularly updated.
- i) Governing bodies should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- j) All staff should be aware and alert to all Indicators of abuse and neglect as laid out in **Appendix 1**

4 Procedures

4.1 Complaints of abuse

- 4.1.1 Every complaint or suspicion of abuse from within or outside the school will be taken seriously and action taken in accordance with this policy.
- 4.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in **Appendix 1**
- 4.1.3 If a member of staff is concerned that a pupil may be suffering harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible. If a member of staff suspects or hears a complaint of abuse, the procedures set out in **Appendix 1 and Appendix 5** must be followed. See paragraph 4.4 of this policy and **Appendix 6** for the procedures for dealing with allegations against staff and volunteers.
- 4.1.4 If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.
- 4.1.5 All staff are particularly reminded:
 - (a) Teachers and health and social care professionals must report to the police cases where they discover that an act of female genital mutilation appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve Children's Services care as appropriate.
 - (b) Normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.
 - (c) Appendix B of KCSIE 2022, provides excellent up-to-date links for further information and guidance in educating and supporting children and staff for all safeguarding concern

4.2 Recording concerns

- 4.2.1 All concerns, discussions and decisions are made in writing on CPOMS or - for visiting staff - the Child Protection and Safeguarding Form which can be found at the Main School Office.
- This record should be clear and comprehensive;
 - The details of how the concern was followed up and resolved;
 - Notes of any actions taken, decisions reached and outcomes.
- 4.2.2 The child's actual words should be recorded.

4.3 Action by the Designated Safeguarding Lead

- 4.3.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:
- (a) the local inter-agency procedures of the Hertfordshire Safeguarding Children Partnership;
 - (b) where relevant, local information sharing protocols relating to Channel referrals;
 - (c) the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to Children's Services and, if appropriate, the police;
 - (d) the child's wishes or feelings balanced with our responsibility to protect other children;
 - (e) duties of confidentiality, so far as applicable;
 - (f) whether there have been any other victims;
 - (g) in cases of peer-on peer abuse, keeping the victim and perpetrator a reasonable distance apart on school premises, including during, before and after school activities
- 4.3.2 Options will then include managing any support for the pupil internally via the school's pastoral support systems, an early help assessment or referral for statutory services
- 4.3.3 If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult with Hertfordshire Safeguarding Children Partnership on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Hertfordshire Safeguarding Children Partnership will be made without delay (and in any event within 24 hours).
- 4.3.4 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to Children's Services within 24 hours. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact Hertfordshire Safeguarding Children Partnership again.
- 4.3.5 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with Hertfordshire Safeguarding Children Partnership and where appropriate an inter-agency assessment will take place, including use of Early Help around the decisions to seek such support for a pupil will be taken in consultation with parents unless there are reasonable grounds for suspecting that in doing so, the pupil will be at risk of significant harm.
- 4.3.6 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.

4.4 Dealing with allegations against staff (including supply staff), Governors and volunteers

- 4.4.1 The School's procedures for dealing with allegations against staff (including supply staff), Governors and volunteers who work with children that address both the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded

allegations must be followed. These procedures are set out in **Appendix 6** and follow Part 4 of Keeping Children Safe in Education 2022.

- 4.4.2 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.
- 4.4.3 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (designated officer(s)). The designated officer(s) will be informed immediately and in any event within one working day of all allegations against staff, Governors and volunteers that come to the school's attention and appear to meet the criteria set out in paragraph 1 of Appendix 6.
- 4.4.4 Early Years Foundation Stage (EYFS)
- (a) The school will inform Ofsted of any allegations of serious harm or abuse by any person living or working with or looking after children in the EYFS setting (Nursery and Reception) (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.
 - (b) These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.
- 4.4.5 Detailed guidance is given to staff, supply staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the **Staff Code of Conduct and Safe Working Practice Policy** and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.
- 4.4.6 Staff, supply staff and volunteers should also feel able to follow the school's separate **Whistleblowing Policy** to raise concerns about poor or unsafe safeguarding practices at the school, potential failures by the school or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.
- 4.4.7 Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
- General guidance can be found at – [Advice on whistleblowing](#)
 - [The NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 am to 8:00 pm, Monday to Friday and Email: help@nspcc.org.uk

4.5 Allegations against pupils

- 4.5.1 All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:
- Bullying (including cyberbullying and prejudice based bullying (including girls whom are transitioning));
 - Abuse in intimate personal relationships between peers;
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
 - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of abuse;

- 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;
- Consensual and non-consensual sharing of nude images and or videos (also known as sexting or youth produced sexual imagery); NB The key consideration is for staff not to view or forward illegal images of a child. When viewing an image is unavoidable it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection. See further guidance <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm and
- Initiating/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element);
- Harmful online challenges and online hoaxes
[//www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes](https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes)

Staff should be clear as to the school's policy and procedures with regards to child-on-child abuse which should never be tolerated or passed off as 'banter' or 'Just having a laugh' or 'part of growing up'. Also see **Appendix 1 Types and Signs of Abuse and Neglect**, **Appendix 2 Child-on-child abuse** and section 3 of this policy Duty of Staff, Governors and Volunteers.

- 4.5.2 Allegations against pupils should be reported in accordance with the procedures set out in this Policy. An incident will be treated as a child protection concern if there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's Behaviour and Exclusions policies will apply.
- 4.5.3 The school will take advice from Hertfordshire Safeguarding Children Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- 4.5.4 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of Children's Services, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.
- 4.5.5 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed.
- 4.5.6 All staff, but especially the Designated Safeguarding Lead should be considering the context within which such incidents and behaviours occur. This is known as contextual safeguarding, which simply means assessments of children could consider whether wider environmental factors are present in a child's life that are a threat to their safety and welfare.

4.6 Missing child and children missing from education procedures

4.6.1 Missing Child

- (a) All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from school. The procedure includes the

requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

(b) Please see the school's separate **Missing Child Policy** for further details.

4.6.2 Children Missing from Education

(a) We monitor pupils' attendance through our daily register;

(b) We inform the applicable local authority (within which the pupil resides when not at the school) within 5 days when we add a pupil to the admission register at a non-standard admission point;

(c) We provide the applicable local authority (within which the pupil resides when not at the school) with all the information held within the admission register about the pupil;

(d) We inform the applicable local authority (within which the pupil resides when not at the school) of any pupils who fail to attend school regularly, or who have been absent without the school's permission for 10 school days or more, at intervals agreed with the LA

(e) When a pupil is to be removed from the admission register due to continuous absence, we will only delete them if we have failed to establish their whereabouts after making reasonable enquiries jointly with the applicable LA.

(f) The school shall inform the applicable local authority (within which the pupil resides when not at the school) of any pupil who is going to be deleted from the admissions register in accordance with government guidance.

4.7 Informing parents

4.7.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Head, the designated officer, Children's Services and / or the police before discussing details with parents.

4.7.2 In relation to Channel referrals, the Designated Safeguarding Lead will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

4.7.3 See also section 3 of **Appendix 4** for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head.

5 Secure school premises

5.1 The school will take all practicable steps to ensure that school premises are as secure as circumstances permit.

5.2 The school keeps a record of all visitors. All visitors must sign in on arrival and sign out on departure and are the responsibility of an identified member of staff at all times whilst on school premises. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the school premises.

5.3 The school's policy on the use of mobile phones and cameras in the school, including the EYFS setting, is as follows:

5.3.1 The school's **Online Safety Policy** sets out the expectations on pupils from Reception to Year 11. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises.

5.3.2 Staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the staff **Code of Conduct and Safe Working Practice Policy**, the **Online Safety Policy** and the **Image Authorisation Policy**. The use of mobile phones and

cameras is prohibited in the Early Years Setting at all times. Photographs should only be taken on school equipment unless prior permission has been sought from the DSL and images used and stored according to our **Image Authorisation Policy** and **Privacy Notice**.

- 5.3.3 Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful. The use of mobile phones and cameras is prohibited in the Early Years setting at all times.
- 5.3.4 The school network is monitored all the time and filters are in place. Where filters raise suspicion over key words, they are investigated immediately. Weekly spot checks take place and monthly reports are produced and usage investigated. These filters are regularly robustly tested to review their effectiveness. The DSL monitors and keeps records of these reviews.

6 Confidentiality and information sharing

- 6.1 The school will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The school will co-operate with police and Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working together to safeguard children 2018 (updated April 2019), Revised Prevent Duty Guidance for England and Wales 2015 (updated April 2019) and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015).
- 6.2 Where allegations have been made against staff, the school will consult with the designated officer and, where appropriate, the police and Children's Services to agree the information that should be disclosed and to whom.

7 Monitoring and review

- 7.1 The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary. The Designated Safeguarding Lead will update the Senior Leadership Team regularly on the operation of the school's safeguarding arrangements. The Designated Safeguarding Lead has a termly Safeguarding review meeting with the Nominated Safeguarding Governor.
- 7.2 Any child protection incidents at the school will be followed by a review of these procedures by the Designated Safeguarding Lead and a report made to the Board of Governors. Where an incident involves a member of staff, the designated officer will assist in this review to determine whether any improvements can be made to the school's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.
- 7.3 The full Board of Governors will undertake an annual review of this Policy and the school's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The Designated Safeguarding Lead will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the full Board of Governors. The written report should address how the school ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the school and how these have been handled; and the contribution the school is making to multi-agency working in individual cases or local discussions on safeguarding matters.

- 7.4 The full Board of Governors should also consider independent corroboration, such as inspection of records or feedback from external agencies including the local authority designated officer. The full Board of Governors will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Board of Governors will be made.

8 Contacts

- 8.1 The details of the designated officer are as follows:

CPSLO Dacorum	01992 555182
School Liaison Admin Support Office	01992 556936
LADO Direct Line and Support Officer	01992 555420

- 8.2 The telephone numbers of the Hertfordshire Children's Services department and other useful agencies are as follows:

Consultation Hub for Child Protection Advice	01438 737511
Children's Services (including out of hours)	0300 123 4043
CAFCASS (Children and Family Court Advisory Support Service)	0300 456 4000
CAMHS (Child and Adolescent Mental Health Service)	0300 7770707
CEOP (Child Exploitation and Online Protection) https://www.ceop.police.uk/ceop-reporting	
Child Protection and Sexual Crime Unit	0370 496 7622
NSPCC	0800 8005000
Ofsted	0300 1233155
ChildLine	0800 1111
The Police	999
Local police non-emergency contact	101
Family Lives	0808 8002222
Gingerbread	0207 4285400

- 8.3 The telephone numbers of relevant Prevent partners are as follows:

Channel Police Practitioner prevent@herts.pnn.police.uk	01438 735373
Non-emergency DfE advice counter-extremism@education.gsi.gov.uk	020 7340 7264

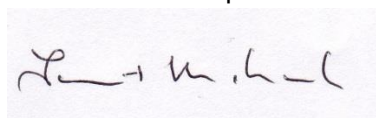
- 8.4 Contacts for pupils:

Hertfordshire Contact Centre	01992 588757
ChildLine	0800 1111
NSPCC	08088 005000
School counsellor	counsellors@abbotshill.herts.sch.uk
Samaritans	116 123

Signed

Issue Date: September 2022

Review Date: September 2023 or earlier if major change



Janet Mark

Chair of the Board of Governors

Appendix 1 – Types and Signs of Abuse and Neglect

Any child may benefit from **early help**, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is a privately fostered child.

7. Abuse and neglect

- a) Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect 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 designated safeguarding lead (or deputy).
- b) All school and college 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.
- c) All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are 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.

8. Indicators of abuse and neglect

- a) **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.
- b) **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.

- c) **Emotional abuse:** 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 from 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.
- d) **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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The abuse of children by other children is a specific safeguarding issue in education see **Appendix 2.**
- e) **Neglect:** 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, for example, 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.

9. Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos. Other safeguarding issues all staff should be aware of include:

a) **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.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus 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.

b) Children and the court system:

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

c) Children missing education (CME)

See Section 4.6.2 of this policy.

d) 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.

e) Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child sexual exploitation (CSE):

CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or 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.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual

activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE 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.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.²²²

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol

- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.²²³

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

f) County lines:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- who go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

g) Modern Slavery:

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery,

servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2022)*".

h) Cybercrime:

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

Cyber-dependent crimes include:

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

i) Domestic abuse (DA):

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. This can take place at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

j) Homelessness:

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy

k) So called 'honour based' abuse, including FGM and forced marriage

This encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Female Genital Mutilation:

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.²³⁰

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage:

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.²³⁴ Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmfco.gov.uk.

l) Child-on-child abuse

See Appendix 2

m) Mental Health

- All staff should also be 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.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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.

- iii. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- iv. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools](#) guidance and follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.
- v. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Additional information and support

DfE Departmental advice [What to Do if You Are Worried a Child is Being Abused- Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

Annex B of KCSIE contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

10) What school and college staff should do if they have concerns about a child

- i. Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- ii. If staff have any concerns about a child's welfare, they should act on them immediately. See Appendix 6 for a flow chart setting out the process for staff when they have concerns about a child.
- iii. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).
- iv. Options will then include:
 - a. managing any support for the child internally via the school's or college's own pastoral support processes;
 - b. an early help assessment; *Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of Working Together to Safeguard Children.*
 - c. making a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm. *Chapter 1 of Working Together to Safeguard Children sets out that the safeguarding partners should publish a threshold document that should*

include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

- v) The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.
- vi) Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.

vii) **Early help**

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

viii) **Statutory children's social care assessments and services**

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: Contextual Safeguarding. <https://contextualsafeguarding.org.uk/>

The online tool Report Child Abuse to Your Local Council directs to the relevant local children's social care contact number. <https://www.gov.uk/report-child-abuse-to-local-council>

ix) Children in need

A child in need is defined under the Children Act 1989 as a child who 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. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

x) Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

xii) What will the local authority do?

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
 - the child is in need, and should be assessed under section 17 of the Children Act 1989;
 - there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
 - any services are required by the child and family and what type of services;
 - further specialist assessments are required to help the local authority to decide what further action to take; and
 - to see the child as soon as possible if the decision is taken that the referral requires further assessment.
- a) The referrer should follow up if this information is not forthcoming.
- b) If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).
- c) If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

15) Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

16) Why is all of this important?

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. *An analysis of serious case reviews can be found at gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017*

Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

See Flow Chart Appendix 5 for Action where there are concerns about a child

Appendix 2 – Child-on-Child Abuse

- 1.1 All Staff should recognise that children are capable of abusing their peers and that this can manifest itself in many ways. Staff must challenge behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- 1.2 There is a zero tolerance approach to sexual violence and sexual harassment.
- 1.3 Child-on-child abuse is most likely to include, but may not be limited to:
- i. bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - ii. abuse in intimate personal relationships between peers;
 - iii. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which encourages, facilitates or threatens physical abuse);
 - iv. sexual violence, such as rape, assault by penetration and sexual assault (which may include online elements);
 - v. sexual harassment, such as sexual comments, remarks, jokes and online harassment, which may be stand alone or part of a broader pattern of abuse;
 - vi. 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;
 - vii. upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (it is a criminal offence and anyone of any gender can be a victim);
 - viii. consensual and non-consensual sharing of nudes (also known as youth produced sexual imagery or sexting); and
 - ix. initiation/hazing type violence and rituals.

Appendix B of KCSIE 2022, provides excellent up-to-date links for further information and guidance in educating and supporting children and staff for all safeguarding concerns.

- 1.4 It is important to note that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh”, “boys being boys” or “part of growing up”. Victims will be reassured that they are supported and that they will be kept safe. A victim will never be given an impression that they are creating a problem by reporting an issue, nor will they ever be made to feel ashamed for making a report
- 1.5 Staff should be aware that evidence shows that children with SEND and LGBTQ+ children are at greater risk

Pupils who are LGBTQ+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education Curriculum and there is a range of support available to help schools to counter homophobic, biphobic and trans bullying abuse.

- 1.6 The School will take advice from the Hertfordshire Children's Services Department (HCSD), on the investigation of allegations of child-on-child abuse and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse, all of whom are treated as being 'at risk'. The School will respond on a case-by-case basis and all pupils will be supported.
- 1.7 Subject to the advice of the Hertfordshire Children's Services Department and/or the police, parents will be informed as soon as possible.

School Procedures

- 2.1 Following a report of child-on-child abuse (which includes sexual violence, sexual harassment, upskirting, racism and inappropriate phobic behaviour), a core group of appropriate staff, usually the DSL (and/or deputy), Head of Year and Form Teacher will make an immediate risk and needs assessment considering:
- the victim;
 - the alleged perpetrator;
 - all other children (and if appropriate, staff);
- 2.2 The risk assessment will be recorded and kept under review. The DSL will consider the following:
- the wishes of the victim in terms of how they want to proceed;
 - the nature of the alleged incident;
 - the ages of the children involved;
 - the development stages of the children involved;
 - any power imbalance between the children;
 - is the incident a one off or a sustained pattern of abuse;
 - are there ongoing risks to the victim, other children, or School staff;
 - contextual safeguarding issues.
- 2.3 The DSL should engage with Hertfordshire Children's Services Department (HCSD), the police and specialised services as required, acting in the best interests of the victim and supporting the alleged perpetrator. Management options are:
- The School manages the incident internally;
 - Multi-agency early help is provided;
 - Referral to Hertfordshire Children's Services Department (HCSD);
 - Reporting to the police (in addition to Hertfordshire Children's Services Department (HCSD)).
- 2.4 Parents will be contacted following an initial investigation so that the child can be fully supported, unless there is a good reason to believe that by doing so the young person will be placed at risk of harm.

The school's ethos and approach to bullying

- 3.1 The Designated Safeguarding Lead will be informed of any bullying incidents when there is a reasonable cause to suspect that a child is suffering or likely to suffer significant harm. A log of bullying concerns, investigations and outcomes is held by the Designated Safeguarding Lead.

- 3.2 The School has a widely publicised anti-bullying policy which is reviewed on a regular basis. The School also promotes positive behaviour on a daily basis, in addition to taking part in local and national initiatives (Anti-bullying week, Mental Health Awareness days for example).
- 3.3 If a child-on-child abuse report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if the person who made the allegation is in need of help. If a report is shown to be deliberately invented or malicious, the DSL and the Head will consider if any disciplinary action is appropriate in line with the Behaviour Policy.
- 3.4 Support for all children is offered through the school counsellor.

Appendix 3 – Radicalisation and the Prevent duty

- 3.1 The school has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 3.2 The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The School is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 3.3 The school has adopted the Government's definitions for the purposes of compliance with the Prevent duty:
Extremism: "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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"
Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"
- 3.4 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.
- 3.5 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:
- 3.5.1. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.
- 3.5.2 Example indicators that an individual is engaged with an extremist group, cause or ideology include:
- spending increasing time in the company of other suspected extremists;
 - changing their style of dress or personal appearance to accord with the group;
 - day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
 - loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
 - possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
 - attempts to recruit others to the group/cause/ideology; or
 - communications with others that suggest identification with a group/cause/ideology.
- 3.5.3. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:
- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
 - using insulting or derogatory names or labels for another group;

- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

3.6 Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

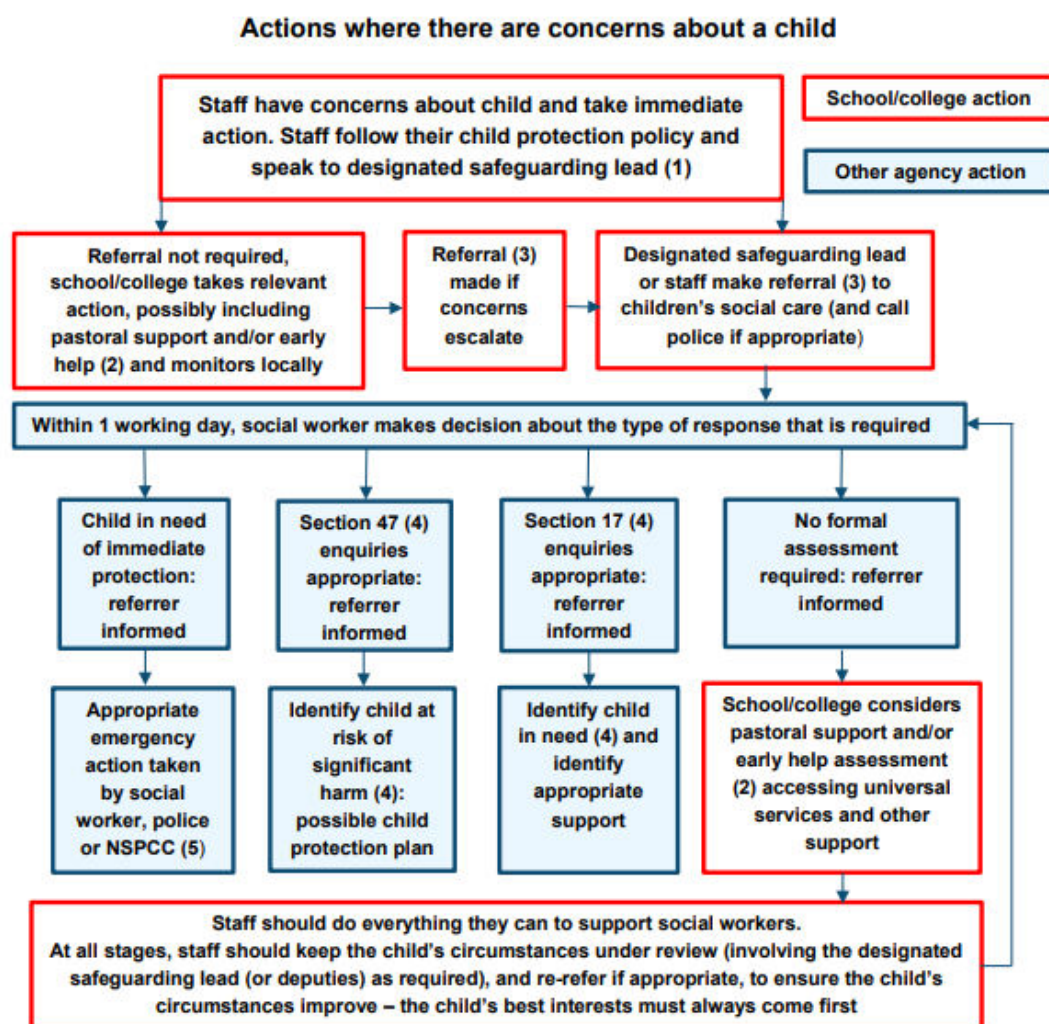
3.7 The DfE's briefing note the use of social media for on-line radicalisation (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

3.8 Annex A and B of KCSIE 2022 contains further information on a range of safeguarding issues.

Appendix 4 – Guidance for staff and volunteers on suspecting or hearing a complaint of abuse

- 1 Action staff must take
 - 1.1 A member of staff or volunteer suspecting or hearing a complaint of abuse:
 - 1.1.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
 - 1.1.2 must not ask leading questions, i.e. a question which suggests its own answer;
 - 1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and
 - 1.1.4 must keep a sufficient written record of the conversation. The record should include:
 - (a) the date and time;
 - (b) the place of the conversation; and
 - (c) the essence of what was said and done by whom and in whose presence; and must be signed by the person making it, using names and not initials.
 - 1.2 The written record and all other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely and passed on when reporting the matter in accordance with paragraph 1.3 below.
 - 1.3 All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in **Appendix 6** should be followed.
 - 1.4 If, at any point, there is a risk of immediate serious harm to a child, (Child at Risk) a referral should be made to Children's Services and/or police immediately. Anybody can make a referral. Where referrals are not made by the Designated Safeguarding Lead, one of the Designated Safeguarding Leads should be informed, as soon as possible, that a referral has been made. Staff do not require parental consent for this referral to be made. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration.
 - 1.5 Where there are concerns that there is a Child in Need, staff should act immediately by contacting the DSL and arranging early help, pastoral support or seeking advice from Hertfordshire Safeguarding Children Partnership.

Appendix 5 – Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix 6 – Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

1. The School's procedures for School staff. (See section 9 onwards for supply staff and contractors)

- 1.1 The School's procedures for dealing with allegations made against staff will be used where a member of staff, the Head, Governor or volunteer has allegedly:
 - 1.1.1 behaved in a way that has harmed a child, or may have harmed a child; and/or
 - 1.1.2 possibly committed a criminal offence against or related to a child; and/or
 - 1.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children; and/or
 - 1.1.4 Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.
- 1.2 These procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follow DfE statutory guidance and the Hertfordshire Safeguarding Children Partnership arrangements.
- 1.3 All such allegations must be dealt with as a priority without delay (within one working day.)
- 1.4 Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out below. (**Appendix 7**) Advice from the local authority designated officer will be sought in borderline cases
- 1.5 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the Police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation/s without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

When dealing with allegations about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

2 Reporting an allegation against a member of staff, the Head, Governor or volunteer

- 2.1 Concerns including allegations which appear to meet the above reporting criteria are to be reported immediately to the **Head**. Where the **Head** is absent or is the subject of the allegation or concern, reports should be made to the **Chair of Governors**. Where the **Head** is the subject of the allegation or concern, the **Head** must not be informed of the allegation prior to contact with the Chair of Governors and local authority designated officer (LADO).
- 2.2 Staff can report directly to the local authority designated officer (LADO)

- 2.3 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

3 Immediate Actions

- 3.1 The local authority designated officer (LADO) should be informed **within one working day** of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
- 3.2 The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police.
- 3.3 Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the Police immediately.
- 3.4 All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed.
- 3.5 The DSL is responsible for ensuring the child is not at risk.
- 3.6 Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer to make a referral to children's social care.

4. Disclosure of information

- 4.1 When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the local authority designated officer (LADO) and if appropriate, the police and/or children's social care.
- 4.2 Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action.
- 4.3 The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- 4.4 The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the individual subject to the allegation. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Where the local authority designated officer (LADO) advises that a strategy discussion is needed, or the police or Children's Services need to be involved, the case manager will not inform the accused

or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

4.5 The reporting restrictions preventing the identification of an individual who is the subject of such an allegation in certain circumstances will be observed.

4.6 EYFS

The School will inform **Ofsted** of any allegations of serious harm or abuse by any person living or working with children or looking after children on the premises of Abbot's Hill School (whether that allegation relates to harm or abuse committed on the premises or elsewhere) and will provide details of the action taken in respect of those allegations. These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

5. Further actions and investigations

5.1 Where further enquiries are required to enable a decision about how to proceed, the local authority designated officer (LADO) and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

5.2 The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

5.3 Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

6. Staff under investigation – support, alternative working arrangements and possible suspension

6.1 The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.¹⁰⁶ Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

6.2 The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;

- redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

6.3 Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the local authority designated officer (LADO), *Working Together* and *Keeping Children Safe In Education* when making a decision about suspension (including with respect to considering alternatives). **Where the individual is suspended, the case manager will confirm the decision within one working day**, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

7. Outcomes

7.1 Where initial discussions lead to **no further action**, the case manager and the designated officer should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

7.2 Unsubstantiated, false, unfounded or malicious allegations

7.2.1 If a report is shown to be **deliberately invented or malicious**, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's **Behaviour Policy**.

7.2.2 Where a parent has made a **deliberately invented or malicious** allegation the Head will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably.

7.2.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the school reserves the right to contact the police to determine whether any action might be appropriate.

7.2.4 If an allegation is shown to be **deliberately invented or malicious**, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

7.3 Substantiated allegations

7.3.1 Where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services, the case manager will

discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made.

7.3.2 The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

7.3.3 If an investigation leads to the **dismissal or resignation prior to dismissal** of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7.4 **Personnel Records**

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA")). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

7.5 **References**

Allegations proven to be **false, unsubstantiated, unfounded or malicious** will not be included in **employer references**. Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information.

7.6 **Charity Commission**

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

8. **Review of procedures**

On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

9. **Arrangements for dealing with Safeguarding concerns or allegations of abuse about supply teachers and contracted staff**

9.1 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 agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the designated officer, police and/or children's social care.

- 9.2 In no circumstances will the School decide to cease to use a supply teacher or agency worker due to safeguarding concerns, without finding out the facts and liaising with the designated officer to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher or agency worker is employed across a number of schools) whether it is appropriate to suspend them, or redeploy them to another part of the school, whilst the investigation takes place.
- 9.3 The School will advise individuals being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the designated officer should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.
- 9.4 When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.
- 9.5 Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). <https://www.gov.uk/guidance/teacher-misconduct-referring-a-case>

10. Low level concerns

Please see [Appendix 7 for Guidance](#)

Appendix 7 – Low Level Concerns (this Appendix should be read in conjunction with Appendix 6)

1. Low Level concerns definition and scope

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

- Inconsistent with the staff code of conduct
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- Does not meet the harm threshold.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviour).

Examples could include but are not limited to:

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

The School takes all concerns about safeguarding seriously and recognises that it is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

Schools should ensure that they promote an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Implemented correctly, this approach should:

- Encourage an open and transparent culture
- Enable the school to identify inappropriate, problematic, or concerning behaviour early
- Minimise the risk of abuse, and
- Ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution

The School's Staff Code of Conduct can be found on the school's intranet. The aim of the Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code at all times.

2. The school's procedures

Staff must share all concerns with the Designated Safeguarding Lead or **Head** without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

The Designated Safeguarding Lead should inform the Head of all low level concerns in a timely fashion according to the nature of each particular concern.

The Head will have the ultimate decision in respect to all low level concerns although the DSL will consult with the Head to collaborate towards a decision.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained with HR in accordance with the Data Retention Policy or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The school will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate a unacceptable culture, or any weaknesses in the school's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the school will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Concerns that do not meet the harm threshold

Concerns may arise in several ways and from a number of sources (e.g. suspicion, complaint, disclosure made any member of the community, or as a result of vetting checks). Concerns will always be taken seriously and appropriate action will be taken to safeguard children. The aim is to encourage an open and transparent culture in which all concerns are dealt with appropriately and promptly, minimize risk of abuse, and ensure that professional boundaries are clearly understood.

Such behaviour may be inadvertent or thoughtless, or perhaps look to be inappropriate without knowing the full context of the circumstance, or it may be intended to enable abuse. These concerns will be shared responsibly with the member of staff, recorded and dealt with appropriately. All staff should be familiar with the Staff Code of Conduct which describes acceptable and unacceptable behaviour.

Step 1 - Low level concerns should be shared with the Designated Safeguarding Lead or **Head**. Following the report of a concern, evidence will be gathered from the complainant according to the following guidelines:

- All low-level concerns should be recorded in writing. Sound professional judgment should be used in determining what information is necessary to record for safeguarding purposes.
- The record should contain details of the concern, the context in which the concern arose and action taken.
- The name of the individual raising the concern should also be noted.
- The record will be signed, dated and timed.

This will help identify the behaviour and determine if any further action needs to be taken. All records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR.

Schools should ensure they create an environment where staff are encouraged to self-refer if, for example, they have found themselves in a situation which may be misinterpreted or may appear compromising to others, or, if on reflection they believe that they have behaved in such a way that they consider falls below the expected professional standards.

Step 2 - The **Head** will review the information and decide whether the behaviour is:

- (i) Entirely consistent with the Staff Code of Conduct
- (ii) Constitutes a low-level concern
- (iii) Is serious enough to consider a discussion with the designated officer
- (iv) When considered with any other previous low-level concerns about this individual, should be reclassified as an allegation and referred to the designated officer

Where the Head is in any doubt, then they should seek advice from the local authority designated officer (LADO).

Speak to the individual about whom the concern is raised (unless the local authority designated officer (LADO).or the Police have advised otherwise if within (iii) or (iv) above).

The Head must make records of:

- All internal conversations;
- All external conversations;
- Their determination;
- The rationale for their decision; and
- Any action taken.

Step 3 – The Next Steps

When the information shared meets organisations expectations and is compliant with Code of Conduct

- The **Head** to inform the individual concerned what was shared about their behaviour and give them an opportunity to respond;
- Speak to the person who shared the low level concern, providing feedback about how and whether the behaviour is consistent with the Code of Conduct and the law;
- Consider if a review of the Code of Conduct is necessary - is the Code not clear? Has the training been unsatisfactory?
- Consider training if the same individual is reported under similar low level concerns again.

When the information shared does not meet the organisation's expectations and is in breach of the Code of Conduct then it is a low level concern

- A sensitive and proportionate response is essential;
- Maintain confidence that concerns will be handled promptly and effectively, whilst protecting staff from potential false or malicious allegations;
- Any investigation is on a 'need to know' basis;
- Some concerns may not give rise to further action, others may be dealt with by management guidance and/or training;
- In many cases, a positive/supportive conversation with the individual will enable them to meet expectations moving forward.

If during these conversations the level of concern is raised, the **Head** will always seek advice from the local authority designated officer.

Record keeping

Records of all low level concerns will be kept on staff files. The record will include:

- Details of the concern
- The context in which the concern arose
- Action taken
- Name of the individual sharing their concerns (if the individual wishes to remain anonymous, this will be respected as far as reasonably possible).

Records should be reviewed so that if a pattern of concerning, inappropriate, problematic behaviour is identified, the School may consider using disciplinary procedures and/or a referral to the local authority designated officer (LADO) where the pattern of behaviour meets the harm threshold.

Low level concerns will not be reported in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance or if they meet the harm threshold.

Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of this happening again.

Appendix 8 – Remote Learning Guidance

1. This Appendix is reviewed annually – last reviewed September 2022.
2. If any young people or staff have to self-isolate, provision is likely to be significantly affected.
3. Under these circumstances, the school's **Safeguarding and Child Protection Policy** is fundamentally the same: children and young people always come first, staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedure.
4. In the unusual circumstance that the DSL or Deputy DDSL is not onsite the Head or a member of the Executive will email all staff by 9am to advise they are acting in an on-site safeguarding role together with contact details for the DSL or DDSL.
5. Staff will continue to follow the **Safeguarding and Child Protection Policy** and advise the safeguarding leads immediately about concerns they have about any child, whether in school or not. Remote learning means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.
6. **Identifying vulnerability**
We have undertaken a scoping exercise to identify the most vulnerable children. Children in all these groups will have weekly meetings either face to face if possible or Google Meet. There will be an opportunity for the child to contact the DSL if they have concerns at any time. If school is forced to close, we will risk assess the needs of the individual child and offer a place in school where possible, desirable and beneficial. Arrangements will be recorded on a Pastoral Action Plan.
 - Looked After Children
 - Previously Looked After Children
 - Children subject to a child protection plan
 - Children who have, or have previously had, a social worker. There is an expectation that children with a social worker must attend school (or another school by arrangement), unless in consultation with the child's social worker and family it is agreed this is not in the best interests of the child.
 - Children with an EHCP or the SENDCo deems vulnerable
 - Children on the edge of social care involvement or pending allocation of a social worker.
 - Other children the school considers vulnerable.
7. **Attendance**
The school is following the attendance guidance issued by the government. Where a vulnerable child is expected and does not arrive at the school, the school will follow its attendance procedure and make contact with the family. If contact is not possible by 9:30am the DSL must be informed. The DSL will attempt a range of methods to contact the parent but if necessary will arrange a home visit by the school or another appropriate agency.
8. **Staff will be aware of increased risk**
Staff will be aware of the mental health of both children and their parents and carers, and must inform the DSL about any concerns.
9. **Child-on-child abuse**
We recognise the potential for abuse to occur between young people, especially in the context of a school closure or partial closure. Our staff will remain vigilant to the signs of child-on-child abuse,

including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age or developmental stages, who are attending school as an interim measure.

10. **Risk online**

Young people will be using the internet more during a period of remote learning. The school may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when children were learning at the school's premises.

The school continues to ensure appropriate filters and monitors are in place. Our governing body will review arrangements to ensure they remain appropriate. The school has taken on board guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. We have reviewed our Online Safety Policy and updated the Acceptable Use Agreements accordingly. The section below has been added to the staff AUA.

The school will keep in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and support them to understand the school systems and the use of filters to monitor online use. The school will communicate with parents and carers about what they are expected to do online including the sites they are required to access and be clear who their child will be communicated with online.

11. **Staff Protocol for using video conferencing and chat facilities**

- All contact must be made using school email addresses and accounts.
- All face-to-face sessions should take place during school hours and during your normal timetabled/scheduled lesson.
- Teachers need to consider and be sensitive to the needs of individual pupils, and those who may be sensitive to certain topics or issues that may arise.
- Teachers must ensure that pupils have left the meeting before they close it.
- There must be a minimum of 3 pupils in each face-to-face interaction, unless permission is received from SLT and parents.
- Video conferencing and chat should only take place between 8.15am – 4.30pm
- Scheduled meeting links should be posted on the Google Classroom and teachers should make it clear that pupils are expected to check in.
- Teachers should be appropriately dressed.
- Teachers should keep a record of attendance.
- Teachers should communicate with SLT should any interactions not be appropriate or conducive to learning.

Staff have read the 20 safeguarding considerations for live-streaming prior to delivering any live-streamed sessions. [Safe Lessons by Video and Livestream.pdf](#)

Children and young people accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the school, Childline, the UK Safer Internet Centre and CEOP.

Parents and carers have received information about keeping children safe online with peers, the school, other education offers they may access and the wider internet community. We have set out the school's approach, including the sites children will be asked to access and set out who from the school their child is going to be interacting with online.

Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

Appendix 9 – KCSIE Which sections should I read and understand

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007260/Keeping_children_safe_in_education_2022.pdf

Summary	All Staff		Pages 4-6
Part 1	Safeguarding information for all staff	All Staff working directly with children and Governors	Page 6-22
Part 2	The management of safeguarding	Governors, Head, SLT, School Nurse, DSL and Deputy DSL's, SENDCo	Pages 23-49
Part 3	Safer recruitment	Governors, Head, SLT, DSL and Deputy DSL's, HR (and any staff involved in interviewing candidates)	Page 50-84
Part 4	Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors	Governors, Head, SLT, DSL and Deputy DSL's and HR	Pages 85-102
Part 5	Child-on-child Sexual Violence and Sexual Harassment	All staff in direct contact with pupils and Governors	Pages 103-132
Annex A	Safeguarding Information for school and college staff	All staff not working directly contact with pupils	Pages 134-138
Annex B	Further Information	All Staff working directly with children and Governors	Pages 139-160
Annex C	Role of the designated safeguarding lead	Governors, DSL, Deputy DSL's, SLT and HR	Pages 161-167
Annex D	Host families - homestay during exchange visits	Governors, DSL, Deputy DSL, SLT, Trip leaders if applicable and Educational Visit Co-ordinator	Pages 168-170
Annex F	Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised	Governors, DSL, Deputy DSL, SLT, Educational Visits Co-ordinator, Assistant Head co-curricular, Trip leaders if applicable, Director of Sport	Pages 171-177
Annex G	Table of substantive changes	DSL and Deputy DSL, Safeguarding Governor	Pages 174-176

Appendix 10 – Safeguarding and Child Protection Declaration

I confirm that I have read and understood the information contained in the **Safeguarding and Child Protection Policy**.

I confirm that I will follow this guidance, and

I confirm that I will ask for more information from the Designated Safeguarding Lead if I have any questions, or do not understand anything.

I am aware that a signed copy of this declaration will be placed in the Safeguarding training file.

In my role as

I can confirm I have read the following sections of KCSIE 2022

Please tick each section that you have read		
Part 1	Safeguarding information for all staff	
Part 2	The management of safeguarding	
Part 3	Safer recruitment	
Part 4	Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors	
Part 5	Child-on-child Sexual Violence and Sexual Harassment	
Annex A	Safeguarding Information for school and college staff	
Annex B	Further Information	
Annex C	Role of the designated safeguarding lead	
Annex D	Host families - homestay during exchange visits	
Annex F	Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised	
Annex G	Table of substantive changes	

Signature

Name

(Block Capitals)

Date